

**To:** Brian Jones[bjones@mjb Bradley.com]  
**From:** Bylin, Carey  
**Sent:** Tue 8/11/2015 8:25:25 PM  
**Subject:** RE: Follow Up

Hi Brian,

Yes, sounds good. Thanks!

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Brian Jones [mailto:[bjones@mjbradley.com](mailto:bjones@mjbradley.com)]  
**Sent:** Tuesday, August 11, 2015 9:11 AM  
**To:** Bylin, Carey  
**Subject:** RE: Follow Up

How about this agenda:

- 1.) EPA - Update on schedule
- 2.) BMP option and Q&A
- 3.) One Future option and Q&A
- 4.) Next Steps

**From:** Bylin, Carey [mailto:[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)]  
**Sent:** Monday, August 10, 2015 5:17 PM  
**To:** Brian Jones <[bjones@mjbradley.com](mailto:bjones@mjbradley.com)>  
**Subject:** Re: Follow Up

Okay, sounds good. Let me know how you want to handle agenda.

Carey Bylin

On Aug 10, 2015, at 3:19 PM, Brian Jones <[bjones@mjbradley.com](mailto:bjones@mjbradley.com)> wrote:

Hi Carey

It looks like 3 pm on Thursday works for the most people. We can use my conference line...I will send an invite.

Thanks

Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

M.J. Bradley & Associates, LLC.

47 Junction Square Drive

Concord, MA 01742

Direct: (978) 405-1269

Mobile: (b)(6) personal privacy

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Email: [bjones@mjbradley.com](mailto:bjones@mjbradley.com)

Web: [www.mjbradley.com](http://www.mjbradley.com)

\*\*\*\*\*

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**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]

**Sent:** Monday, August 10, 2015 10:16 AM

**To:** Brian Jones <[bjones@mjbroadley.com](mailto:bjones@mjbroadley.com)>  
**Subject:** RE: Follow Up

Hi Brian,

Thursday at noon, 1p or 3p looks good for us. Would any of those work for you?

---

Ms. Carey Bylin

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**From:** Brian Jones [<mailto:bjones@mjbroadley.com>]

**Sent:** Monday, August 10, 2015 9:17 AM



**To:** Bylin, Carey  
**Subject:** Follow Up

Hi Carey

I hope you enjoyed your weekend. I had a good call with the DSI companies on Friday afternoon. I can fill you in on the high points of the discussion when you have time. Also, they are interested in having a call this week. Can you shoot me a few times that work for you?

Thanks  
Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

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Email: [bjones@mjbradley.com](mailto:bjones@mjbradley.com)

Web: [www.mjbradley.com](http://www.mjbradley.com)

\*\*\*\*\*

**From:** Bylin, Carey

**Location:** Ex. 6 - Personal Privacy

**Importance:** Normal

**Subject:** Accepted: DSI-EPA Call - Methane Challenge Program

**Start Date/Time:** Thur 8/13/2015 7:00:00 PM

**End Date/Time:** Thur 8/13/2015 8:00:00 PM

**From:** Bylin, Carey  
**Location:** EPA; 1201 Constitution Ave NW (Have the guard call Jerome upon arrival)  
**Importance:** Normal  
**Subject:** Accepted: FSA Meeting with EPA - Methane Challenge & Life Cycle Calculator  
**Start Date/Time:** Thur 8/27/2015 2:00:00 PM  
**End Date/Time:** Thur 8/27/2015 3:00:00 PM

**From:** Bylin, Carey  
**Importance:** Normal  
**Subject:** Meeting Forward Notification: Meeting at API on EPA Methane Challenge (Ex. 6 - Personal Privacy)  
Ex. 6 - Personal Privacy  
**Start Date/Time:** Fri 8/7/2015 7:30:00 PM  
**End Date/Time:** Fri 8/7/2015 8:00:00 PM

## Your meeting was forwarded

Bylin, Carey has forwarded your meeting request to additional people.

### Meeting

Meeting at API on EPA Methane Challenge (Ex. 6 - Personal Privacy)

### Meeting Time

Tuesday, August 11, 2015 1:00 PM - Tuesday, August 11, 2015 2:30 PM

### Recipients

Weitz, Melissa, Suzanne Waltzer, DeFigueiredo, Mark, McKittrick, Alexis, Pamela Franklin, Paul Gunning, Bruce Moore, Cozzie, David

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

---

**From:** Bylin, Carey  
**Importance:** Normal  
**Subject:** Accepted: Meeting at API on EPA Methane Challenge ( **Ex. 6 - Personal Privacy** )  
**Start Date/Time:** Tue 8/11/2015 5:00:00 PM  
**End Date/Time:** Tue 8/11/2015 6:30:00 PM

**From:** Bylin, Carey  
**Importance:** Normal  
**Subject:** Accepted: Agenda for API Meeting on Methane Challenge  
**Start Date/Time:** Thur 8/6/2015 5:00:00 PM  
**End Date/Time:** Thur 8/6/2015 5:30:00 PM

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Tue 8/4/2015 1:59:27 PM  
**Subject:** RE: Proposed Agenda for One Future-EPA Meeting

Hi Tom,

Okay, we can discuss that on the call. I have a baseline question as well. We can of course deviate if needed but shall we plan to go with that agenda?

---

Ms. Carey Bylin

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**From:** Tom Michels [mailto:tmichels@bwstrategies.com]  
**Sent:** Tuesday, August 04, 2015 9:11 AM  
**To:** Bylin, Carey  
**Subject:** RE: Proposed Agenda for One Future-EPA Meeting

I think this works – I can think of one key question from our side:

Will companies be able to utilize direct measurements in lieu of emission factors? (At least initially, I think everyone is clear that the GHGRP factors may not permit this without regulatory action, so I think this question applies primarily to non-GHGRP factors.)

Tom Michels, Principal



BlueWater Strategies

25 Massachusetts Avenue, NW

Suite 820

Washington, DC 20001

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Office – 202-589-0015

Mobile –202-413-2059

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**From:** Bylin, Carey [mailto:Bylin.Carey@epa.gov]  
**Sent:** Tuesday, August 04, 2015 8:58 AM  
**To:** Tom Michels



**Subject:** Proposed Agenda for One Future-EPA Meeting

Hi Tom,

Here's what I was thinking for the One Future meeting. I still need to run this by EPA folks but wanted to see if it meets your expectations in terms of what we want to discuss this afternoon.

- Discussion of any key points/questions from Methane Challenge proposal - 15 min
- Review of timing and activities for developing detailed technical guidance - 30 min
- Wrap up and discuss next steps (e.g. process, regular meeting schedule) – 15 min

---

Ms. Carey Bylin

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Tue 8/4/2015 12:58:22 PM  
**Subject:** Proposed Agenda for One Future-EPA Meeting

Hi Tom,

Here's what I was thinking for the One Future meeting. I still need to run this by EPA folks but wanted to see if it meets your expectations in terms of what we want to discuss this afternoon.

- Discussion of any key points/questions from Methane Challenge proposal - 15 min
- Review of timing and activities for developing detailed technical guidance - 30 min
- Wrap up and discuss next steps (e.g. process, regular meeting schedule) – 15 min

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**To:** Drew Nelson[dnelson@edf.org]  
**From:** Bylin, Carey  
**Sent:** Fri 7/31/2015 9:36:17 PM  
**Subject:** Re: Timing for next call on international data

Yes, perfect.

Carey Bylin

On Jul 29, 2015, at 4:51 PM, Drew Nelson <[dnelson@edf.org](mailto:dnelson@edf.org)> wrote:

im wide open those days. should we say the 25<sup>th</sup> at 2 eastern/I central?

**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
**Sent:** Wednesday, July 29, 2015 12:19 PM  
**To:** Drew Nelson  
**Subject:** RE: Timing for next call on international data

Okay, let's get something on the books. Here are some avail on my end (DC time):

- 8/25: 11a-3p
- 8/26: after noon
- 8/27 & 28: anytime

---

Ms. Carey Bylin

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**From:** Drew Nelson [<mailto:dnelson@edf.org>]  
**Sent:** Wednesday, July 29, 2015 2:51 PM  
**To:** Bylin, Carey  
**Subject:** RE: Timing for next call on international data

sure thing. im actually going to be in Wyoming/montana for the vacation part of this trip starting on Monday so after august 17 is better.

**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
**Sent:** Tuesday, July 28, 2015 1:29 PM  
**To:** Drew Nelson  
**Subject:** Timing for next call on international data

Hi Drew,

Hope all is well. As you may have seen we released our domestic Methane Challenge proposal last week and I've been somewhat consumed with that such that I haven't come

back to you with a date for a follow up conversation to our chat last week. I would ideally like to put this off several weeks to later in August. Would that work for you? If so, I'll still send around my avail so we can get something on the calendar.

---

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**To:** Lia Parisien[lparisien@ecos.org]  
**From:** Bylin, Carey  
**Sent:** Fri 7/31/2015 8:06:47 PM  
**Subject:** FW: Please Reply by 2 p.m. Eastern: Rescheduling Aug. 3 SGC Webinar  
Methane Challenge Program ECOS.pdf

Hi Lia,

Sorry for the delay, here are my slides for the ECOS webinar, which I understand is now 8/12 3-4p.

---

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Natural Gas STAR Program

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**From:** Sarah Greenberg [mailto:[Sarah.Greenberg@erg.com](mailto:Sarah.Greenberg@erg.com)]  
**Sent:** Friday, July 31, 2015 3:44 PM  
**To:** Lia Parisien  
**Cc:** Rudolph - CDPHE, Martha; [dglatt@nd.gov](mailto:dglatt@nd.gov); [Adam.Langmaid@erg.com](mailto:Adam.Langmaid@erg.com); Allison Berkowitz; [arleen.odonnell@erg.com](mailto:arleen.odonnell@erg.com); Frithsen, Jeff; Matthews, Lisa; Marks, Teresa; Bylin, Carey; Alexandra Dapolito Dunn; Valdez Murphy - CDPHE, Brandy; [ccain@nd.gov](mailto:ccain@nd.gov)  
**Subject:** Re: Please Reply by 2 p.m. Eastern: Rescheduling Aug. 3 SGC Webinar

Thanks, Lia. I will update the webinar date and time in GoToWebinar, which will automatically send email notifications to everyone that has registered thus far alerting them to the change.

The update will not change webinar registration link or the call-in information.

Best,

Sarah

---

Sarah Greenberg | Eastern Research Group

781-674-7304 | [sarah.greenberg@erg.com](mailto:sarah.greenberg@erg.com)

On Jul 31, 2015, at 3:27 PM, Lia Parisien <[lparsien@ecos.org](mailto:lparsien@ecos.org)> wrote:

All:

Thank you for your quick replies! Sorry about the last-minute change, but it was made in the interest of getting maximum attendance.

We will reschedule for Wednesday, August 12 at 3-4 p.m. Eastern. I will distribute a revised agenda to the SGC membership in a bit.



Sarah, do I need to change the registration link? Are those who already registered all set, or do they need to re-register?

Many thanks,

Lia

On Fri, Jul 31, 2015 at 10:07 AM, Lia Parisien <[lparisien@ecos.org](mailto:lparisien@ecos.org)> wrote:

Aug. 3 SGC Webinar Speakers and Organizers:

My apologies, but due to a scheduling conflict that has arisen we will need to reschedule the Monday webinar. I'd appreciate it if you would please let me know by **2 p.m. Eastern today** which of the following alternate times work for you:

Friday, August 7 at noon Eastern, 1 p.m. Eastern, 2 p.m. Eastern, or 3 p.m. Eastern

Monday, August 10 at noon Eastern, 1 p.m. Eastern, 2 p.m. Eastern, or 3 p.m. Eastern

Wednesday, August 12 at noon Eastern, 1 p.m. Eastern, 2 p.m. Eastern, or 3 p.m. Eastern

Many thanks!

---

Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

(202) 266-4931

[www.ecos.org](http://www.ecos.org)

*Mark your calendar for the Aug. 31-Sept. 2 ECOS Fall Meeting in Newport, RI!*

--

Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

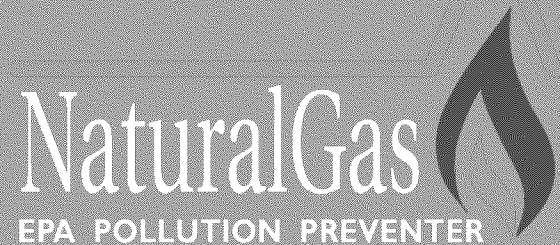
(202) 266-4931

[www.ecos.org](http://www.ecos.org)

*Mark your calendar for the Aug. 31-Sept. 2 ECOS Fall Meeting in Newport, RI!*

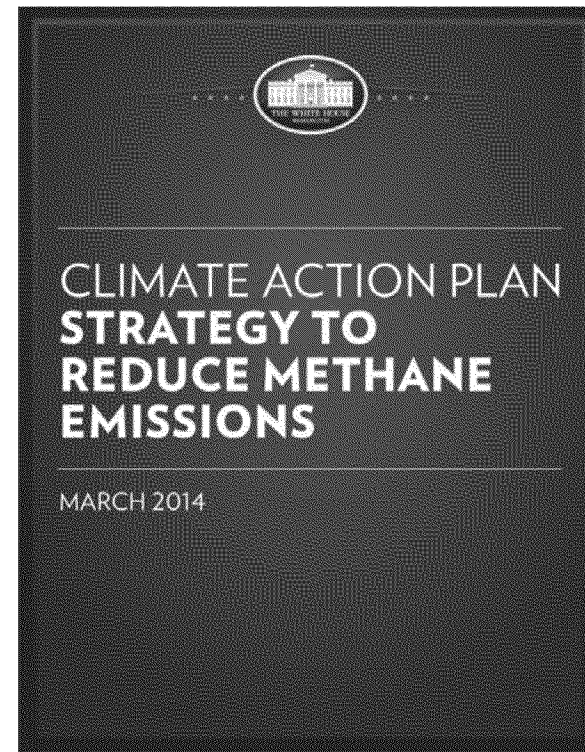
# U.S. EPA Natural Gas STAR Methane Challenge Program

ECOS Webinar  
August 12, 2015



# Background

- **March 2014** – White House releases the *Strategy to Reduce Methane Emissions*
  - Outlined regulatory and voluntary actions in the oil and gas sector
- **January 2015** – Administration announces a new goal to cut methane emissions from the oil and gas sector by 40-45 percent from 2012 levels by 2025
  - Included series of regulatory and voluntary steps EPA and other federal agencies are pursuing a to put us on a path toward the 2025 goal
- **July 2015** – EPA released Methane Challenge proposal to solicit feedback before finalizing Program in Fall



# Relationship to Natural Gas STAR and Previously Proposed Gas STAR Gold

- Methane Challenge expands Natural Gas STAR
  - Specific, ambitious commitments
  - Transparent reporting through Subpart W of the Greenhouse Gas Reporting Program (with supplemental, voluntary reporting)
  - Company-level recognition of commitments and progress
  - Under Natural Gas STAR, companies make general commitments and progress is tracked at program level
- Methane Challenge replaces the facility-based approach of the Gas STAR Gold proposal
  - 2014 Gas STAR Gold proposal outlined a certification-type program for facilities
  - Stakeholder feedback emphasized need for greater flexibility
  - Methane Challenge Program seeks to achieve a balance of ambitious voluntary commitments with appropriate flexibility

# Proposed Methane Challenge Program Structure

- Company commitments should:
  - Be ambitious and achieve meaningful methane reductions across company operations;
  - Be transparent with the ability to track and account for progress; and
  - Demonstrate continuous improvement over time
- To enhance flexibility, propose to offer two commitment options:
  - Best Management Practice (BMP) Commitment
  - One Future Emissions Intensity Commitment
- Companies can select the option that best fits with their capabilities and corporate priorities to reduce methane emissions
- Program would cover onshore oil production and whole value chain from onshore production through distribution of natural gas

# Best Management Practice (BMP)

## Commitment Option

- **Commitment:** Company-wide implementation of best management practices (BMPs) to reduce methane emissions from key sources by a future target date
  - Partner companies would commit to at least one emission source
  - Target date to be selected by the Partner company (maximum of 5 years)
  - Proposed commitment levels vary by sector and are included in Appendix 3 of the proposal
- **Scope:** EPA has identified key emission sources based on their contribution to national emissions and stakeholder interest
  - Program will outline multiple BMPs, as appropriate, to maximize flexibility in achieving commitments; companies select BMPs suited to their operations
  - EPA to consider adding new, innovative mitigation activities to BMPs



# One Future Emissions Intensity Commitment Option

- **Commitment:** Companies commit to sector-specific intensity targets
  - Intensity targets represent emissions per volume produced or volume of throughput
  - Targets add up to a 1% or less “leakage rate” along the value chain by 2025
- **Scope:** Companies selecting this option would engage directly with One Future
  - Determine the organizational structure or level at which commitments will be made
  - Establish specific company-wide commitments
  - Companies can choose mix of mitigation options to achieve targets





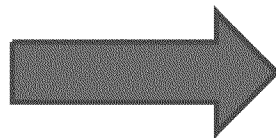
# Other Potential Commitment Options

- EPA has also heard some interest in offering a third commitment option: the Emission Reduction (ER) Commitment
  - Commitment would be made to reduce methane emissions by a certain percentage from an agreed company-wide emissions baseline by a future date (to be determined by the company)
  - Companies would select the mix of sources they will address
- EPA is currently not offering this option because of significant implementation challenges
- EPA welcomes feedback from stakeholders
  - How to address the implementation challenges
  - Level of industry support/interest in signing up to ER commitment

# Transparency is a Principal Goal



- Partner companies would report on mitigation actions that contribute to their commitments through a public platform managed by EPA
- EPA aims to minimize the reporting burden, to the extent possible, such that partner companies can focus time and resources on the implementation of methane-reducing activities

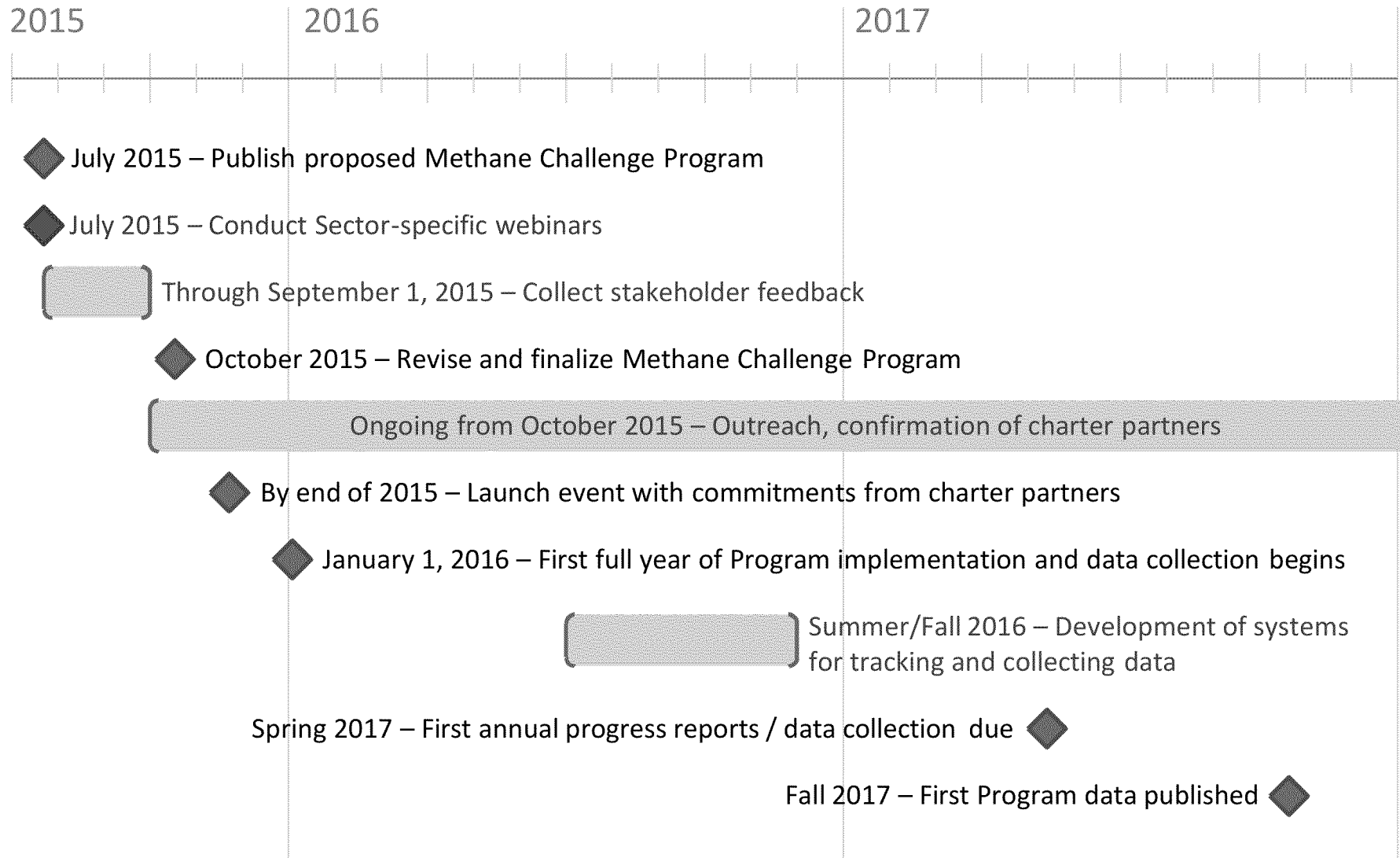


- Subpart W of the GHGRP already collects most of the information that would be relevant to tracking Program commitments at the company level
- EPA proposes to rely on GHGRP Subpart W data, plus any needed supplemental data, to track progress in meeting commitments under the Methane Challenge Program

# Partner Recognition and Benefits

- Proposed Program provides companies with the opportunity to showcase systematic and comprehensive actions to reduce methane emissions
  - Both commitment options suitable for companies at different stages of progress in implementing mitigation actions
- Implementing BMPs and mitigation activities reduces operational risk, increases efficiency and demonstrates company concern for the environment
- Partners would be recognized as leaders in demonstrating action to minimize methane emissions in the United States.
- EPA encourages feedback on potential recognition incentives
  - E.g. awards for outstanding performance in reducing emissions and/or achieving commitment goals, for example by setting aggressive timelines for completing a significant amount of mitigation actions.

# Anticipated Schedule (Timeline)



# Feedback and Next Steps

- You can provide feedback in two different ways:
  - Submit your feedback online at [www.epa.gov/gasstar/methanechallenge/](http://www.epa.gov/gasstar/methanechallenge/)
  - Send feedback by email to [methanechallenge@tetrattech.com](mailto:methanechallenge@tetrattech.com).
- EPA encourages interested stakeholders to schedule a meeting with Carey Bylin at (202) 343-9669 or by email at [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)
- Please provide feedback by September 1, 2015
- EPA also seeks to engage stakeholders on development of technical details of sources and proposed BMPs

# Questions



**To:** Brian Jones[bjones@mjbradley.com]  
**From:** Bylin, Carey  
**Sent:** Fri 7/31/2015 12:32:29 PM  
**Subject:** Re: Methane Challenge

How about 930a tomorrow? Let me know if I should call your direct line or mobile.

Carey Bylin

On Jul 30, 2015, at 4:58 PM, Brian Jones <[bjones@mjbradley.com](mailto:bjones@mjbradley.com)> wrote:

Hi Carey

How about tomorrow 9 or 10 am for a discussion?

Thanks

Brian

Brian Jones  
508-496-7807

On Jul 30, 2015, at 4:43 PM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

Hi Brian,

Hope all is going well.

In terms of scheduling the next call, let's discuss key agenda items and then determine when would be the best time to meet. I think it will be some time until we can release any technical details (my hope is to be able to do it within a month or so). So the question is, would DI members find it valuable to discuss the proposal in general? Would they want to share feedback informally and, if so, when would they be ready to do so? Or do they have questions that we can address in a meeting?

Might be better if you and I chat live about next steps – are you around tomorrow?

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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<image001.gif>

**From:** Brian Jones [<mailto:bjones@mjb Bradley.com>]

**Sent:** Wednesday, July 29, 2015 5:09 PM

**To:** Bylin, Carey

**Subject:** RE: Methane Challenge

Hi Carey,

Yes, that sounds great.



Thanks

Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

M.J. Bradley & Associates, LLC.

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**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
**Sent:** Wednesday, July 29, 2015 3:50 PM  
**To:** Brian Jones <[bjones@mjbroadley.com](mailto:bjones@mjbroadley.com)>  
**Subject:** RE: Methane Challenge

Hi Brian,

Thanks for getting in touch – we are so glad to have the proposal out! Still lots to do though...it would be great to talk, but I want to discuss first with management what and when we can start sharing with respect to technical materials. That could drive when we should schedule. Okay if I get back to you in the next day or so on next steps?

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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<image001.gif>

**From:** Brian Jones [<mailto:bjones@mjb Bradley.com>]  
**Sent:** Wednesday, July 29, 2015 9:46 AM  
**To:** Bylin, Carey  
**Subject:** Methane Challenge

Hi Carey,

Congratulations on the release of the proposal.

Looking forward to continuing the Downstream Initiative's engagement on the details.  
Let me know how you would like to move forward...Can we schedule a time for a call  
with the companies on the BMPs?

Thanks

Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

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**To:** Brian Jones[bjones@mjb Bradley.com]  
**From:** Bylin, Carey  
**Sent:** Thur 7/30/2015 8:43:39 PM  
**Subject:** RE: Methane Challenge

Hi Brian,

Hope all is going well.

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Ms. Carey Bylin

International Programs Leader, Oil and Gas

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Brian Jones [mailto:[bjones@mjbradley.com](mailto:bjones@mjbradley.com)]

**Sent:** Wednesday, July 29, 2015 5:09 PM

**To:** Bylin, Carey

**Subject:** RE: Methane Challenge

Hi Carey,

Yes, that sounds great.

Thanks

Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

M.J. Bradley & Associates, LLC.

47 Junction Square Drive

Concord, MA 01742

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Mobile: (b)(6) personal privacy

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\*\*\*\*\*

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**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]

**Sent:** Wednesday, July 29, 2015 3:50 PM

**To:** Brian Jones <[bjones@mjbradley.com](mailto:bjones@mjbradley.com)>

**Subject:** RE: Methane Challenge

Hi Brian,

Thanks for getting in touch – we are so glad to have the proposal out! Still lots to do though....it would be great to talk, but I want to discuss first with management what and when we can start sharing with respect to technical materials. That could drive when we should schedule. Okay if I get back to you in the next day or so on next steps?

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**From:** Brian Jones [<mailto:bjones@mjb Bradley.com>]

**Sent:** Wednesday, July 29, 2015 9:46 AM

**To:** Bylin, Carey

**Subject:** Methane Challenge

Hi Carey,



Congratulations on the release of the proposal.

Looking forward to continuing the Downstream Initiative's engagement on the details. Let me know how you would like to move forward...Can we schedule a time for a call with the companies on the BMPs?

Thanks

Brian

\*\*\*\*\*

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Senior Vice President, Strategy and Policy

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Email: [bjones@mjbradley.com](mailto:bjones@mjbradley.com)

Web: [www.mjbradley.com](http://www.mjbradley.com)

\*\*\*\*\*

**To:** Lia Parisien[lparisien@ecos.org]  
**From:** Bylin, Carey  
**Sent:** Thur 7/30/2015 7:07:25 PM  
**Subject:** RE: DATE CORRECTION: Agenda for Aug. 3 SGC Webinar and e-MATRIX Launch

Hi Lia,

Sorry for the delay in following up on this. I'm still planning to participate and I think I will use slides. Can I send you those tomorrow? Thanks again for this opportunity. I am looking forward to it.

---

Ms. Carey Bylin

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Lia Parisien [mailto:[lparsien@ecos.org](mailto:lparsien@ecos.org)]  
**Sent:** Tuesday, July 28, 2015 7:34 PM  
**To:** Lia Parisien  
**Subject:** Fwd: DATE CORRECTION: Agenda for Aug. 3 SGC Webinar and e-MATRIX Launch

Please use the following URL to register for the webinar, as the one provided in the previous email contained a hyperlink glitch:

-

<https://attendee.gotowebinar.com/register/3085129939806290178>

Also, if you encounter problems with the link from a mobile device, simply register from a desk computer.

Thanks!

----- Forwarded message -----

**From:** Lia Parisien <[lparsien@ecos.org](mailto:lparsien@ecos.org)>  
**Date:** Tue, Jul 28, 2015 at 5:24 PM  
**Subject:** DATE CORRECTION: Agenda for Aug. 3 SGC Webinar and e-MATRIX Launch  
**To:** Lia Parisien <[lparsien@ecos.org](mailto:lparsien@ecos.org)>

Members of the ECOS Shale Gas Caucus (SGC) and Overseeing Waste Committee:

Please find attached an agenda for the next SGC webinar on **Monday, August 3 at noon - 1 p.m. Eastern.**

We are delighted to announce that the webinar will feature the launch of the SGC's ECOS Methane and Air Toxics Reduction Information Exchange (e-MATRIX) best practices database, which you can now preview from the e-MATRIX link at [http://ecos.org/section/shale\\_gas\\_caucus/](http://ecos.org/section/shale_gas_caucus/).

The webinar also will include discussion of U.S. EPA's draft hydraulic fracturing drinking water assessment and the agency's newly proposed voluntary Natural Gas Star Methane Challenge Program.

Please register for the webinar at least 15 minutes advance  
at: <https://attendee.gotowebinar.com/register/3085129939806290178>

If you have any questions, feel free to contact me.

Regards,

SEP 2011

Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

[\(202\) 266-4931](tel:(202)266-4931)

[www.ecos.org](http://www.ecos.org)

*Mark your calendar for the Aug. 31-Sept. 2 ECOS Fall Meeting in Newport, RI!*

--

Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

[\(202\) 266-4931](tel:(202)266-4931)

[www.ecos.org](http://www.ecos.org)

*Mark your calendar for the Aug. 31-Sept. 2 ECOS Fall Meeting in Newport, RI!*

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Wed 7/29/2015 7:53:04 PM  
**Subject:** RE: Great job!

Thanks so much, Tom! Really great to hear that it's coming off okay. I've been living and breathing this for the last 6+ months so I better be able to explain it at this point.

How about if we pencil in 3p on Tuesday and I'll come back if anyone raises an issue to me. We can use the following conference line:

Toll-free dial-in number (U.S. and Canada): Ex. 6 - Personal Privacy

International dial-in number: Ex. 6 - Personal Privacy

Conference code: Ex. 6 - Personal Privacy

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [mailto:tmichels@bwstrategies.com]

**Sent:** Wednesday, July 29, 2015 3:49 PM

**To:** Bylin, Carey

**Subject:** Re: Great job!

Tuesday at 3pm would be great! Let me know when you can confirm.

And again, thanks so much for working with us. Also, for whatever it's worth I just think you've been doing very well on the webinars - very clear, very concise, great delivery of very complex material. I know it's not an easy feat to pull off, so bravo!

Tom Michels, Principal  
[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)  
Office - [202-589-0015](tel:202-589-0015)  
Direct - [202-589-1759](tel:202-589-1759)  
Mobile - [202-413-2059](tel:202-413-2059)

*Sent from my mobile. Please pardon any typos.*

On Jul 29, 2015, at 3:36 PM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

Hi Tom,

Thanks for the feedback – my goal of course was to portray everything accurately so I’m glad to hear I did. Thanks also for the note from last Friday, we are very pleased that the proposal looked good to One Future! As you said, we have a lot of work to do so I’m checking with our team for some times to have our next meeting. Preliminarily I’m thinking that Tuesday at 3p could work but I’m double checking with folks. Any immediate concerns with that time on your end?

---

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [<mailto:tmichels@bwstrategies.com>]  
**Sent:** Wednesday, July 29, 2015 1:59 PM  
**To:** Bylin, Carey  
**Subject:** Great job!

You're describing all of our stuff very well and very accurately. Thank you !

Tom Michels

Executive Director

**ONE Future Coalition**

[www.onefuture.us](http://www.onefuture.us)

Principal,

**BlueWater Strategies llc**

25 Massachusetts Avenue, NW

Suite 820

Washington, DC 20001

[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)

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Office – 202-589-0015

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**To:** Brian Jones[bjones@mjbradley.com]  
**From:** Bylin, Carey  
**Sent:** Wed 7/29/2015 7:50:22 PM  
**Subject:** RE: Methane Challenge

Hi Brian,

Thanks for getting in touch – we are so glad to have the proposal out! Still lots to do though....it would be great to talk, but I want to discuss first with management what and when we can start sharing with respect to technical materials. That could drive when we should schedule. Okay if I get back to you in the next day or so on next steps?

---

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Brian Jones [mailto:[bjones@mjbradley.com](mailto:bjones@mjbradley.com)]  
**Sent:** Wednesday, July 29, 2015 9:46 AM  
**To:** Bylin, Carey  
**Subject:** Methane Challenge

Hi Carey,

Congratulations on the release of the proposal.

Looking forward to continuing the Downstream Initiative's engagement on the details. Let me know how you would like to move forward...Can we schedule a time for a call with the companies on the BMPs?

Thanks

Brian

\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

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**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Wed 7/29/2015 7:36:02 PM  
**Subject:** RE: Great job!

Hi Tom,

Thanks for the feedback – my goal of course was to portray everything accurately so I'm glad to hear I did. Thanks also for the note from last Friday, we are very pleased that the proposal looked good to One Future! As you said, we have a lot of work to do so I'm checking with our team for some times to have our next meeting. Preliminarily I'm thinking that Tuesday at 3p could work but I'm double checking with folks. Any immediate concerns with that time on your end?

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**From:** Tom Michels [mailto:tmichels@bwstrategies.com]  
**Sent:** Wednesday, July 29, 2015 1:59 PM  
**To:** Bylin, Carey  
**Subject:** Great job!

You're describing all of our stuff very well and very accurately. Thank you !

Tom Michels

Executive Director

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Principal,

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Office – 202-589-0015

Mobile –202-413-2059

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**To:** Drew Nelson[dnelson@edf.org]  
**From:** Bylin, Carey  
**Sent:** Wed 7/29/2015 7:19:24 PM  
**Subject:** RE: Timing for next call on international data

Okay, let's get something on the books. Here are some avail on my end (DC time):

- 8/25: 11a-3p
- 8/26: after noon
- 8/27 & 28: anytime

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Drew Nelson [mailto:[dnelson@edf.org](mailto:dnelson@edf.org)]  
**Sent:** Wednesday, July 29, 2015 2:51 PM  
**To:** Bylin, Carey  
**Subject:** RE: Timing for next call on international data

sure thing. im actually going to be in Wyoming/montana for the vacation part of this trip starting on Monday so after august 17 is better.

**From:** Bylin, Carey [mailto:[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)]  
**Sent:** Tuesday, July 28, 2015 1:29 PM  
**To:** Drew Nelson  
**Subject:** Timing for next call on international data

Hi Drew,

Hope all is well. As you may have seen we released our domestic Methane Challenge proposal last week and I've been somewhat consumed with that such that I haven't come back to you with a date for a follow up conversation to our chat last week. I would ideally like to put this off several weeks to later in August. Would that work for you? If so, I'll still send around my avail so we can get something on the calendar.

---

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**To:** Drew Nelson[dnelson@edf.org]  
**From:** Bylin, Carey  
**Sent:** Tue 7/28/2015 8:28:56 PM  
**Subject:** Timing for next call on international data

Hi Drew,

Hope all is well. As you may have seen we released our domestic Methane Challenge proposal last week and I've been somewhat consumed with that such that I haven't come back to you with a date for a follow up conversation to our chat last week. I would ideally like to put this off several weeks to later in August. Would that work for you? If so, I'll still send around my avail so we can get something on the calendar.

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**To:** Conrad Schneider[cschneider@catf.us]  
**From:** Bylin, Carey  
**Sent:** Thur 7/23/2015 8:56:35 PM  
**Subject:** FW: EPA Releases Natural Gas STAR Methane Challenge Proposal  
[methane\\_challenge\\_proposal\\_072315.pdf](#)

Hi Conrad,

I got your voicemail – right around launch time! I assume you have received this notification?

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

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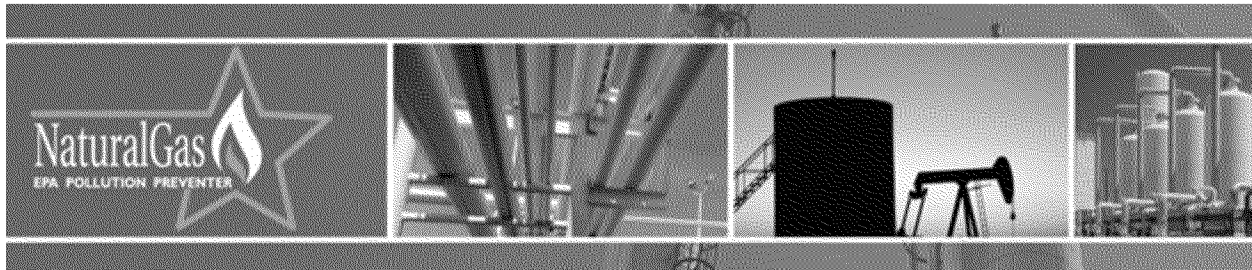
1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** EPA Natural Gas STAR Program [mailto:gasstar@tetrattech.com]  
**Sent:** Thursday, July 23, 2015 4:14 PM  
**To:** Bylin, Carey  
**Subject:** EPA Releases Natural Gas STAR Methane Challenge Proposal



EPA is proposing the voluntary [Natural Gas STAR Methane Challenge Program](#) (“Methane Challenge”) (PDF), which would provide a new mechanism through which oil and gas companies could make and track ambitious commitments to reduce methane emissions. The Program is based on extensive stakeholder outreach and is a significant revision of EPA’s previously proposed Gas STAR Gold framework.

While tremendous progress has been made during the last 20 years through the successful Natural Gas STAR Program, significant opportunities remain to reduce methane emissions, improve air quality, and capture and monetize this valuable energy resource. This new program has the capability to comprehensively and transparently reduce emissions and realize significant voluntary reductions in a quick, flexible, cost-effective way.

## **Register to attend an upcoming webinar**

EPA is hosting a series of webinars from July 28-30, 2015 to provide details about the proposed Methane Challenge Program. Each webinar will address specific oil and gas sectors. You can learn more and register to attend the webinars at [Methane Challenge Webinars](#).

## **EPA seeks your feedback**

EPA encourages stakeholders to closely review and provide feedback on any and all elements of the proposed Methane Challenge Program. EPA will carefully consider and evaluate all feedback received through September 1, 2015. EPA intends to launch the Methane Challenge Program later in 2015. To learn more about the Methane Challenge Program, see the [Natural Gas STAR Methane Challenge Program homepage](#).



# **Natural Gas STAR Methane Challenge Program: Proposed Framework**



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## Addressing U.S. Oil and Gas Methane Emissions

EPA is proposing the voluntary Natural Gas STAR Methane Challenge Program (“Methane Challenge”), which would provide a new mechanism through which companies could make and track ambitious commitments to reduce methane emissions. The Program is based on extensive stakeholder outreach<sup>1</sup> and reflects a revision of EPA’s previously proposed framework for an enhanced voluntary partnership in the oil and gas sector. While tremendous progress has been made during the last 20 years through the Natural Gas STAR Program, significant opportunities remain to reduce methane emissions, improve air quality, and capture and monetize this valuable energy resource. The proposed Methane Challenge Program will create a platform for leading companies to go above and beyond existing voluntary action and make meaningful and transparent commitments to yield significant methane emissions reductions in a quick, flexible, cost-effective way.

This document represents the next step in EPA’s ongoing work with stakeholders to design and launch a new, ambitious voluntary program. EPA is interested in stakeholder feedback on all aspects of the Methane Challenge proposal as well as how best to align the Program with other Administration efforts to reduce emissions. Highlighted at the end of this document are several specific areas where feedback would be particularly appreciated.

The Methane Challenge Program is an integral part of the EPA’s – and the Administration’s -- ongoing commitment to address methane emissions and global climate change. In March 2014, the White House released the *Strategy to Reduce Methane Emissions* that included EPA efforts to reduce methane emissions in the oil and natural gas sector.<sup>2</sup>

In January 2015,<sup>3</sup> the Obama Administration further demonstrated its commitment by announcing a goal to cut methane emissions from this sector by 40-45 percent from 2012 levels by 2025. EPA and other federal agencies are pursuing a series of regulatory and voluntary steps to put us on a path toward the 2025 goal. The agency plans to build on its 2012 New Source Performance Standards for the oil and natural gas industry to achieve both methane reductions and additional reductions in VOCs. EPA also plans to extend VOC reduction requirements to existing oil and gas sources in areas that could particularly benefit from VOC reductions: ozone nonattainment areas and states in the Ozone Transport Region. The agency will do this by issuing Control Techniques Guidelines (CTGs) that provide an analysis of the available, cost-effective technologies for controlling VOC emissions from covered oil and gas sources.<sup>4</sup> Many controls to reduce VOCs also reduce methane as a co-benefit.<sup>5</sup>

---

<sup>1</sup> In the first half of 2015, EPA met with industry associations, individual oil and gas companies, industry-led initiatives, NGOs, other federal agencies (including Department of Energy and Department of Transportation), EPA regions, and states to gain feedback and participation in the design of this new approach. The Downstream Initiative group of natural gas distribution companies has been particularly engaged and constructive in proposing possible structures for the program and providing extensive feedback on program options.

<sup>2</sup> “Climate Action Plan,” <https://www.whitehouse.gov/sites/default/files/image/president27climateactionplan.pdf>

<sup>3</sup> “Administration Takes Steps Forward on Climate Action Plan by Announcing Actions to Cut Methane Emissions,” <https://www.whitehouse.gov/the-press-office/2015/01/14/fact-sheet-administration-takes-steps-forward-climate-action-plan-anno-1>

<sup>4</sup> CTGs apply in ozone nonattainment areas that are classified as moderate and above, and throughout the states in the Ozone Transport Region.

<sup>5</sup> EPA has received feedback from industry stakeholders to consider structuring any future Control Technique Guidelines (CTGs) in such a way that would provide incentives for early voluntary action.



The Methane Challenge Program will complement these regulatory actions, providing incentives and opportunities for companies to undertake and document ambitious voluntary methane emission reductions, principally from existing methane emission sources. Voluntary efforts to reduce emissions in a comprehensive and transparent manner hold the potential to realize significant reductions in a quick, flexible, cost-effective way.

EPA recognizes the potential overlap for coverage of this program with forthcoming regulatory actions, including emission sources that could be covered under CTGs, and emissions sources on federal lands, which are being evaluated for potential regulations by the Bureau of Land Management. EPA appreciates that companies in some segments of the industry may face uncertainty until these actions are finalized. Nonetheless, EPA believes that there is interest from leading companies to make meaningful commitments and the proposed Methane Challenge Program provides a platform for these actions, particularly those not covered in the regulations.

### **Relationship to the Natural Gas STAR Program and Gas STAR Gold**

Since 1993, EPA's Natural Gas STAR Program has successfully collaborated with the oil and natural gas industry on implementation of cost-effective methane emission reduction technologies and practices. To join Natural Gas STAR, partner companies commit to evaluating their operations to identify opportunities to reduce methane emissions, and to implement and report on their progress. Gas STAR partners have identified and implemented over 50 specific cost-effective technologies and practices throughout the oil and natural gas value chain. Through 2013, Gas STAR partner companies have reported voluntary methane emission reductions of over one trillion cubic feet (over 400 MMTCO<sub>2</sub>e).

The Methane Challenge Program will expand on Natural Gas STAR by creating a structure through which companies can make specific, ambitious voluntary commitments and annually submit data and information through Subpart W of the Greenhouse Gas Reporting Program (with some supplemental voluntary reporting) to transparently track progress. This is a significant departure from Natural Gas STAR, in which partner companies make a general commitment, participate at a range of levels (e.g., company-wide to facility or regional level), and only report information on emission reduction actions. In this way, the Methane Challenge Program provides a platform for companies that truly want to excel and differentiate themselves. The two hallmarks of the proposed program - ambitious commitments and transparency – will facilitate information sharing about accomplishments and progress made. Thus, the program can serve as a catalyst for broad industry adoption of best practices to reduce emissions.

The Methane Challenge proposal also seeks to balance ambitious voluntary commitments with appropriate flexibility. In response to EPA's 2014 Gas STAR Gold proposal, which outlined a certification-type program where facilities could adopt a comprehensive set of emission-source protocols to achieve "Gold" certification, many companies emphasized the need for greater programmatic flexibility. The feedback received on the Gas STAR Gold proposal, which EPA is not moving forward with, has resulted in this new Methane Challenge approach to an expanded voluntary program. Rather than a facility focus that was the basis of the Gas STAR Gold approach, the Methane Challenge Program proposal emphasizes company-wide commitment options. The proposed Methane Challenge Program incorporates flexibility into several program elements, including implementation timeframes to inspire ambition in a structure that is achievable.

EPA plans to maintain the Natural Gas STAR Program and to continue activities such as annual reporting of emission reduction activities and technology transfer workshops. For current Natural Gas STAR



partners that join the Methane Challenge, EPA would work with them to determine how and/or if they will participate in each program, in order to allow appropriate recognition and avoid duplication of efforts in reporting to each program.

### Goals of the Methane Challenge Program

Through the Methane Challenge Program, EPA is proposing to recognize leading companies that make voluntary, transparent commitments to increased action to reduce methane emissions from their operations. The key objectives of the proposed Program would be to achieve the following:

- Encourage and support ambitious industry commitments to significantly reduce methane emissions
- Offer flexible mechanisms to achieve stated commitments
- Promote innovative approaches to emissions measurement, monitoring and reduction technologies and practices
- Provide accountability and transparency for making and achieving commitments through robust annual data reporting that utilizes EPA's Greenhouse Gas Reporting Program (GHGRP) to the maximum extent possible
- Recognize progress of companies that have been proactive in reducing methane emissions
- Recognize improved environmental performance through quantitative assessment of reductions in emissions.

### Methane Challenge Program Structure

The Methane Challenge Program would invite companies with operations throughout the natural gas value chain – onshore production, gathering and boosting, processing, transmission, storage, and distribution segments – and in onshore oil production to commit to action under the Challenge. EPA has three primary criteria for recognizing companies as partners under this Program; company commitments should (1) be ambitious and achieve meaningful methane reductions across company operations; (2) be transparent with the ability to track and account for progress, and (3) demonstrate continuous improvement over time. EPA is proposing that companies participating in the Methane Challenge would have the opportunity to choose from two options<sup>6</sup> to reduce methane emissions from their operations:

- Best Management Practice (BMP) Commitment
- One Future Emissions Intensity Commitment

By signing up to either or both of these commitments, companies would become recognized partners in the Methane Challenge Program. The BMP commitment option is intended to drive near-term, widespread implementation of methane mitigation activities from key methane emission sources throughout the industry. Formed in 2014, the One Future program is an existing industry-led partnership through which companies make ambitious commitments to achieve methane emission intensity targets based on program-defined sector-specific emission rates<sup>7</sup>. Both options represent expanded, transparent voluntary commitments by partner companies that will drive further voluntary action to reduce oil and gas methane emissions. By recognizing both of these commitment options

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<sup>6</sup> Companies could also opt to sign up for both commitment options.

<sup>7</sup> EPA is not a formal member of One Future, but is proposing to support this industry-led effort. EPA applauds the strong commitment to reduce methane and believes that providing this linkage to Methane Challenge will facilitate the achievement and tracking of any reductions associated with this effort.





under the Methane Challenge Program, EPA seeks to promote adoption of expanded voluntary methane emission commitments while offering flexibility to allow companies to select the path that best fits with their capabilities and corporate priorities in reducing emissions.

To become a partner, individual companies would enter into agreements with EPA (e.g. via a memorandum of understanding (MOU)) to document their respective commitments. The MOU would also cover specific interactions with EPA, including reporting of baseline and mitigation activities through the GHGRP and supplemental data collection mechanisms. EPA is proposing that, within six months of joining the Methane Challenge Program, all partner companies would also develop an Implementation Plan to detail key aspects of their planned participation, such as anticipated rate of progress, key milestones, and context for their implementation plans (e.g., referencing work to be done during the next planned shutdown of a facility).

As part of their commitment, partners would track their progress through a transparent public mechanism (e.g., data system and website). EPA is proposing to leverage the significant amount of data reported by facilities to the Petroleum and Natural Gas Systems source category (Subpart W) of the GHGRP, plus voluntarily supplied supplemental data (as needed), to serve as the basis for tracking specific company actions. On an annual basis, the Program will compile relevant data from partner companies and release it publicly in order to transparently reflect individual company progress in meeting commitments.

Table 1. Process for Company Engagement

Key Steps	BMP Commitment	One Future (OF) Commitment
<b>Join Program</b>	Sign MOU with EPA covering source commitments, timing and agreement to submit data to Methane Challenge program	Sign MOU with OF covering commitments and timing; sign MOU with EPA agreeing to submit data to Methane Challenge Program
<b>Announce Commitments</b>	Company and commitments listed on Methane Challenge website	Company listed on Methane Challenge website with link to commitments, as listed on OF website
<b>Submit Implementation Plan</b>	Submit to EPA, with key milestones, six (6) months after joining program	Submit to OF and EPA, with key milestones, six (6) months after joining program
<b>Establish Baseline</b>	Not applicable	2012 supplemental data provided to Methane Challenge reporting mechanism to establish baseline (per EPA-specified data collection methodologies)
<b>Annual Reporting</b>	Submit voluntary supplementary data via Methane Challenge reporting mechanism (covered sources only)	Submit voluntary supplementary data via Methane Challenge reporting mechanism
<b>Annual Progress Tracking</b>	Source-specific data (activity and emissions) rolled up at company level and provided on Methane Challenge website	Company listing on Methane Challenge website links to company emissions intensity progress on OF website
<b>Data Transparency<sup>8</sup></b>	GHGRP data and voluntary data made available publicly	GHGRP data and voluntary data made available publicly

<sup>8</sup> To help promote transparency and visibility of the Methane Challenge Program and its member commitments, EPA envisions publicly releasing data voluntarily submitted to the Methane Challenge Program. In addition, EPA



## Best Management Practice (BMP) Commitment Option

Under this option, companies would commit to company-wide implementation of best practices to reduce methane emissions from key sources by a future date, as determined by the partner company. EPA would provide sector-specific lists of key methane emission sources and corresponding best management practices (BMPs). Partner companies would address one or more of these sources, and would designate the timing for achieving company-wide implementation of related BMPs. Companies could set different timelines for each source, as appropriate to their historic progress and anticipated ability to meet commitments. However, to drive action to reduce emissions in the near term, EPA is proposing that timing for full completion of commitments should not exceed five (5) years from the commitment date, and that commitments should include interim milestones (e.g. on an annual basis) to ensure steady progress towards full completion by the commitment date. EPA encourages companies to complete commitments in a shorter timeframe when appropriate. Companies would annually report on mitigation actions implemented and the program would track emissions reductions achieved as a result of voluntary actions taken.

### *Scope*

EPA has identified key emission sources (see Appendix 1) based on their contribution to national emissions and stakeholder interest in addressing those sources through a voluntary program. For each source, EPA would identify one or more BMPs to achieve mitigation commitments (see Appendix 2). Offering multiple BMPs (mitigation options) for each source would provide flexibility for partner companies to select activities and technologies that are best for their operations. To encourage innovation, EPA would consider additional mitigation activities for potential inclusion in the BMP option as data becomes available or upon request for consideration from partner companies. EPA will also consider adding new sources in the future.

EPA is proposing recommendations on how to define the organizational structure or level at which companies would make their Methane Challenge commitments. Companies have provided feedback that the ability to undertake widespread implementation of BMPs can vary, and corporate-wide commitments may not always be feasible. EPA seeks to define company commitments that find the appropriate balance of covering a significant portion of operations, while also defining a scope that is appropriate for widespread implementation of best practices. EPA's proposed organizational levels for establishing Methane Challenge commitments are provided in Appendix 3.

EPA has also received feedback that there may be operational circumstances or other conditions that could limit comprehensive implementation of BMPs for a given source. EPA is seeking feedback on the possibility of allowing partners to request an exemption to full implementation for each source commitment. Such exemptions could be considered on the condition that the exempted sources (basically, those for which a mitigation option is not implemented) would not represent a significant portion of methane emissions from that source, and would be transparently documented in annual results to provide context for company achievements. EPA is requesting feedback on whether to include this potential exemption option and, if so, how to structure it.

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would publish data submitted to the GHGRP as part of reporting under 40 CFR Part 98 that has not been determined to be confidential business information per GHGRP rulemakings.



### *Benefits and Considerations*

The BMP option offers the opportunity for partner companies to demonstrate comprehensive action to address methane emissions from key emitting sources. This option provides flexibility for companies in several ways: (1) to focus their commitment on one or more sources; (2) to establish the implementation timeframe, including relevant milestones as well as the target year for company-wide implementation of best practices; and (3) to select from BMP options that are affiliated with each source.

Companies that have already made significant progress in implementing BMPs prior to joining the Methane Challenge program (for example, because of their participation in the Natural Gas STAR Program) would be able to demonstrate that progress through the annual reporting process, and through the selection of a shorter timeframe for achieving company-wide implementation of best practices. In such a scenario, while these companies would be recognized for their progress in implementing BMPs, the commitments may not result in significant additional reductions in methane emissions. EPA seeks feedback on specific program design options that encourage partners to make source-specific commitments that would recognize progress and yield significant additional emission reductions. For example, the Program could specify that partner companies initially choosing to focus on a single source would agree to add another source to their commitment within three years of joining the Program. EPA requests feedback on how to structure the BMP option such that companies would be incentivized to regularly update commitments to continuously improve performance over time.

### **One Future Emissions Intensity Commitment Option**

ONE Future is an existing industry program administered by ONE Future, Inc., which is a 501(c)(6) entity<sup>9</sup>. It is a coalition of companies from across the natural gas industry focused on identifying policy and technical solutions that yield continuous improvement in the management of methane emissions associated with the production, processing, transmission and distribution of natural gas. One Future companies make a commitment to achieve a specified average rate of emissions intensity across all facilities within a specific segment by 2025. Each company has the flexibility to determine the most cost-effective pathway to achieve that goal – and agrees to demonstrate progress according to specific reporting protocols<sup>10</sup>. One Future companies have encouraged EPA to incorporate their approach into the Methane Challenge Program and have expressed their support for ambitious commitments and transparent tracking mechanisms that are hallmarks of the proposed program.

Partner companies choosing to adopt One Future's emissions intensity targets are making commitments that are congruent with EPA's goals in terms of ambition and transparency of commitments. Therefore, EPA proposes to recognize these companies' efforts as partners in the Methane Challenge program. Companies opting for this commitment would join the One Future partnership and, in doing so, agree to provide relevant supplemental data to EPA to demonstrate their methane emission reduction actions. EPA would recognize ONE Future participants' commitments and provide a reporting platform for transparently tracking company progress against commitments.

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<sup>9</sup> <http://www.onefuture.us/>

<sup>10</sup> EPA would work in collaboration with One Future to develop reporting protocols.



### *Scope*

Companies selecting this option would engage directly with One Future to establish their specific company-wide commitment and determine the organizational structure or level at which companies will make their commitments.

### *Benefits and Considerations*

A benefit to selecting to join One Future is that companies making this commitment have full flexibility to select the mix of emission reduction activities they will undertake to achieve their goal. The design also allows for changes in operations (e.g. acquisitions, divestments) without having to adjust a baseline. Since the commitment is focused on intensity-based goals, it implicitly includes recognition of historic action to reduce methane emissions.

A potential issue could be the possibility that companies are already near their target intensity, and their commitments therefore would not yield significant additional methane emission reductions. Therefore, EPA seeks feedback on how partner companies participating through the One Future option could be incentivized to continuously improve performance by reducing emissions below levels necessary to achieve One Future's target, if appropriate.

### **Other Potential Commitment Options**

While EPA is proposing the two options above for stakeholders to participate in this new Methane Challenge Program, we have also heard some interest in offering a third commitment option: the Emission Reduction (ER) Commitment. That type of approach is favored by some companies and offers the benefit of flexibility for companies that want to select the mix of sources they will address. EPA has not developed it as a full option at this time because, as described below, there are significant challenges with implementing this approach. However, given the interest in this approach that some have expressed, we welcome feedback on more fully developing this option contingent on addressing the identified challenges and having strong industry support.

### *Commitment*

If the ER commitment option is included within the Methane Challenge Program, companies selecting it would commit to reducing their methane emissions by a certain percentage from an agreed company-wide emissions baseline by a future date (to be determined by company). EPA would propose a minimum percentage reduction in company-wide methane emissions that companies would need to meet, and partner companies could choose that commitment target, or select a higher percentage. Companies would also indicate the year in which they anticipate achieving their target reduction rate. All participating companies would set targets from a common baseline established by EPA, which could be, for example, the average of 2013-2014 GHGRP Subpart W data, plus any supplemental data needed to complete the baseline information. These two years provide a recent data set, which would facilitate the provision of any retroactive supplemental data. Using the average of two years of data may help smooth any emissions fluctuations.

### *Scope*

It is anticipated that this commitment option could be undertaken at the corporate level, but EPA seeks comment from companies with a strong interest in this option with respect to the organizational level or structure at which companies would make this commitment.

### *Benefits and Considerations*

The ER commitment option would offer partner companies full flexibility to determine the exact mix of mitigation options they would implement to achieve their reduction commitments. By specifying an actual target, it would also drive emission reductions.

However, EPA has identified a number of challenges to implementing this approach:

- Any changes to a company's operations would need to be accounted for in an adjusted baseline, and tracking and adjusting the baseline operations and emissions could present a significant challenge, particularly in the upstream sector where acquisitions and divestitures of assets occur on a regular basis.
- EPA has already received feedback that an ER commitment could be problematic for companies that seek to expand their operations.
- Some stakeholders mentioned that the inclusion of voluntary supplemental data (e.g. for facilities below the GHGRP's reporting threshold of 25,000 metric tons CO<sub>2</sub>e per year) will mean that companies participating in the Program may show higher total emissions levels relative to their counterparts who are not participating in the Program.

### **Tracking Methane Challenge Program Progress**

One of the principal goals of the Methane Challenge Program is to transparently demonstrate partner company commitments and progress related to implementing mitigation options and reducing methane emissions from key methane sources throughout the oil and natural gas value chain. Therefore, all Methane Challenge partner companies would report on their voluntary mitigation actions that contribute to their commitments through a public platform managed by EPA. EPA also aims to minimize the reporting burden, to the extent possible, such that partner companies can focus time and resources on the actual implementation of methane-reducing activities. Because relevant oil and gas data are already collected by Subpart W of the GHGRP, EPA proposes to rely heavily on GHGRP Subpart W data to track progress in meeting commitments under the Methane Challenge Program.

Subpart W of the GHGRP already collects most of the information that would be relevant to tracking Methane Challenge Program commitments at the company level. However, it is anticipated that participating companies may need to provide some supplementary, voluntarily-supplied data to comprehensively track progress against their stated commitments. For example, voluntary supplementary data would be needed to show progress for facilities that do not report to the GHGRP because their emissions are less than the GHGRP reporting threshold of 25,000 metric tons CO<sub>2</sub>e, or for sources or mitigation activities not currently reported to the GHGRP.<sup>11</sup> Also, because the Methane Challenge Program is intended to incentivize and recognize voluntary actions, EPA is considering whether and how to collect supplementary data that enables the Program to distinguish company actions that are driven by regulation from those that are undertaken voluntarily in non-regulated environments or that go beyond regulatory requirements.

As part of the Methane Challenge Program implementation, EPA would provide a mechanism for companies to voluntarily report data elements that underpin their Program commitments. Though the exact mechanism is still under evaluation, EPA would create a streamlined reporting system that collects

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<sup>11</sup> For example, stakeholders in the distribution sector have indicated interest in potentially addressing emissions from distribution pipeline blowdowns and reporting the use of cast iron pipe liners, both of which are currently not reported to the GHGRP.



supplemental data needed to demonstrate progress against commitments and uses similar references and language as the current reporting forms used for collecting GHGRP data, in order to create a user-friendly system for reporting of voluntary data.

On an annual basis, relevant data on specific company actions (e.g. GHGRP data and voluntary supplementary data) would be rolled up to the partner company level to show progress against commitments.

- **BMP option:** activity and emissions data for the sources being targeted by the partner company would be presented on the Methane Challenge Program website. The website would list the partner company, its commitments, and annual data showing the activity data and emissions levels for the target sources, allowing for tracking of progress and emission reductions year on year.
- **One Future option:** the One Future program would use activity and emissions data reported into the Program (via GHGRP and supplementary data) to show company progress on the One Future website.<sup>12</sup>
- **ER option:** if it is adopted, the Methane Challenge Program website would show partner company commitments, and on an annual basis would roll up total emissions, in order to show year-to-year progress toward meeting the reduction goal.

Note that supplemental emissions data would be needed for all sources for the One Future or ER commitment options. For the BMP option, partners will provide supplemental data only for sources that have been selected by the company (e.g. if a partner chooses to focus on pneumatics and reciprocating compressors, the company will need to provide supplemental data only for those sources). The One Future and ER commitment options would also need this supplemental data provided for past year baseline emissions data.

To help promote the transparency and visibility of the Methane Challenge Program and of its member commitments and achievements, EPA envisions publicly releasing voluntarily submitted data. In addition, EPA would publish data submitted to the GHGRP as part of reporting under 40 CFR Part 98 that has not been determined to be confidential business information per GHGRP rulemakings.

## Recognition

EPA's goal in proposing the Methane Challenge Program is to balance providing incentives for ambitious commitments with appropriate flexibility to ensure that companies are confident in their ability to meet those commitments. EPA also strives to achieve the appropriate level of ambitious commitment in the Methane Challenge Program that facilitates industry participation while recognizing the efforts of companies that have gone "above and beyond" business as usual. EPA considers the commitments to have intrinsic merit, and therefore is not proposing a tiered system to "rank" commitments by partner companies. The options are designed with manageable first steps for partner engagement. The BMP option allows for expansion of commitments over time as appropriate to an individual company's ability to take on further reduction activities. The One Future option provides significant flexibility for participating companies committed to achieving its ambitious, performance-based target. EPA encourages feedback on potential recognition of outstanding performance in reducing emissions and/or achieving commitment goals, for example by setting aggressive timelines for completing a significant

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<sup>12</sup> The Methane Challenge Program website would list all participating companies. For companies participating in One Future, external links would be provided to the One Future website, which will track company progress on an on-going basis.



amount of mitigation actions. EPA is particularly interested in how to encourage companies to continue expanding the scope of their commitments to the extent they have already made significant progress. For example, partner companies could be recognized for achieving continuous improvement through expansion of program participation and commitment levels over time.

### **Continuous Improvement**

EPA will strive to promote continuous improvement in the Methane Challenge Program. Partner companies would have the opportunity, and would be encouraged, to expand their commitments at any time. This would allow for continued growth of emissions reductions and implementation of mitigation activities as companies make progress in reaching existing commitments.

EPA is interested in potential mechanisms that would allow for continuous improvements in the Program over time in order to address the greatest emission reduction opportunities and help to contribute to the Administration's 2025 methane reduction target. For example, the Program will seek to encourage new and innovative BMPs, as well as methodologies for monitoring and measuring progress. At the launch, the Program would have basic agreement and understanding with partners about the BMPs to choose from to meet commitments, based on known mitigation activities already implemented in oil and gas operations. This would underpin the list of acceptable mitigation practices associated with each source in the BMP commitment option, as well as any supplemental data elements that would need to be collected to support partner company reporting of specific mitigation actions for the One Future or ER option. The final Methane Challenge Program document will outline a process for partner companies to alert EPA to any new "pilot" mitigation activities that they are testing, to potentially include these activities in the Program if they prove to be at least as effective as mitigation activities already recognized by the Program.

In support of the Methane Challenge Program's goal of promoting continuous improvement, the EPA will coordinate with other entities, as appropriate, to stimulate the development and validation of new methodologies to identify, quantify, and mitigate methane emissions. Such actions could boost existing partner participation, and encourage new companies to take on Methane Challenge commitments. For example, the U.S. Department of Energy, in collaboration with the National Energy Technology Laboratory, could undertake work to support new applications for methane mitigation and monitoring technology, including in the context of pilot projects.

### **Methane Challenge Partner Benefits**

The Methane Challenge Program would provide companies with the opportunity to transparently showcase systematic and comprehensive actions to reduce methane emissions and be publicly recognized as leaders in reducing methane emissions in the U.S. At the company level, doing so reduces operational risk, increases efficiency, and demonstrates company concern for the environment, with benefits spanning from climate change to air quality improvements to conservation of a non-renewable energy resource.



## Next Steps

This proposal is intended to outline EPA's concept for the framework of the proposed Methane Challenge Program. EPA encourages all stakeholders to closely review and provide feedback on any and all elements of the proposed Program. EPA will carefully consider and evaluate all feedback received and is requesting comments by September 1, 2015. Interested stakeholders can submit comments through the Program website [www.epa.gov/gasstar/methanechallenge](http://www.epa.gov/gasstar/methanechallenge) or via e-mail to [methanechallenge@tetrattech.com](mailto:methanechallenge@tetrattech.com), or can request meetings by contacting Carey Bylin at 202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov). EPA will also be organizing sector-specific webinars in July; webinar details can be found on the Program website.

EPA plans to continue to work through technical and implementation details with input from stakeholders. In particular, EPA will work with companies indicating significant interest in joining the Program, to ensure that implementation details meet both EPA's and partner companies' needs. As a result of regulatory developments in process, there may be a phase-in of coverage of certain sources and sectors within the Program.<sup>13</sup>

EPA intends to launch the Methane Challenge Program by the end of 2015, possibly in conjunction with the next Natural Gas STAR Annual Implementation Workshop in November 2015. More details about the launch will be forthcoming.

## Proposed Timeline<sup>14</sup>

Milestone	Anticipated timeframe
Publish proposed Methane Challenge Program	July 2015
Sector-specific webinars	July 2015
Collect stakeholder feedback	Through September 1, 2015
Revise and finalize Methane Challenge Program	October 2015
Outreach, confirmation of charter partners	Ongoing from October 2015
Launch event with commitments from charter partners	By end of 2015
First full year of Program implementation and data collection begins	January 1, 2016
Development of systems for tracking and collecting data	Summer/Fall 2016
First annual progress reports / data collection due	Spring 2017
First Program data published	Fall 2017

<sup>13</sup> Per the January 14, 2015 announcement: "Building on five technical white papers issued last spring, the peer review and public input received on these documents, and the actions that a number of states are already taking, EPA will initiate a rulemaking effort to set standards for methane and VOC emissions from new and modified oil and gas production sources, and natural gas processing and transmission sources... In developing these standards, EPA will work with... stakeholders to consider a range of common-sense approaches that can reduce emissions from the sources discussed in the agency's Oil and Gas White Papers, including oil well completions, pneumatic pumps, and leaks from well sites, gathering and boosting stations, and compressor stations. (<https://www.whitehouse.gov/the-press-office/2015/01/14/fact-sheet-administration-takes-steps-forward-climate-action-plan-anno-1>)

<sup>14</sup> Proposed timeline reflects goal to launch Methane Challenge Program by end of 2015.





## Questions for Stakeholders

EPA encourages stakeholders to provide comments on any and all aspects of the proposed Methane Challenge Program. EPA will carefully consider and evaluate all feedback received through July 2015. To the extent appropriate, applicable, and consistent with the aims of the Methane Challenge Program, this feedback will be incorporated into a revised framework document.

Following are specific areas in which EPA encourages stakeholders to provide feedback by September 1, 2015:

1. Please indicate whether your company has specific interest in one of the commitment options presented, including the possibility or likelihood of your company potentially making that commitment.
2. In addition to recognition through the Program, what are the key incentives for companies to participate in this Program? Should EPA offer some partners extra recognition, such as awards?
3. EPA is proposing to launch the Program with charter partners by the end of 2015, but will welcome new partners on an ongoing basis. Please comment on the likelihood of your company committing to join this Program as a charter partner, or at a future date.
4. For the BMP option, how can EPA encourage companies to make commitments for sources for which they have not made significant progress in implementing mitigation options? In other words, how can companies be encouraged to participate beyond the sources for which they have already made significant progress?
5. Please provide comments on the sources and corresponding BMPs that are provided in Appendix 2, including any recommended additions, deletions, or revisions.
6. Please comment on the proposed definitions of the companies or entities that will make BMP commitments, per Appendix 3.
7. Is a 5-year time limit to achieve BMP commitments appropriate? If not, please provide alternate proposals. Would a shorter time limit encourage greater reductions earlier?
8. Should EPA offer the ER commitment option? If so, please provide specific recommendations for ways that EPA could address the implementation challenges outlined in this document. What is the minimum target company-specific reduction level that should be set for participation in this option? Would your company use this option if it were offered?
9. To what extent is differentiating the voluntary actions from regulatory actions important to stakeholders? What are the potential mechanisms through which the Program could distinguish actions driven by state or federal regulation from those undertaken voluntarily or that go beyond regulatory requirements?
10. EPA plans to leverage existing reported data through the GHGRP (Subpart W) in addition to supplemental data that partners would submit to EPA. Would the e-GGRT system be an appropriate mechanism to collect the voluntary supplemental data?
11. Would companies be willing and able to make commitments related to emission sources where EPA has proposed, but not yet finalized, new GHGRP Subpart W requirements?
12. EPA seeks feedback on potential mechanisms for encouraging continued, active participation in the Program once a company's initial goals have been achieved.
13. EPA is proposing to call this new voluntary effort the "Natural Gas STAR Methane Challenge Program", and welcomes comments and suggestions on this name.

**Appendix 1: Proposed Sources for BMP Commitment Option**

The following table lists recommended methane emission sources that EPA is considering for inclusion in the BMP commitment option at the time of program launch.<sup>15</sup> EPA welcomes comment on this list of focal sources.

Sectors	Sources
Onshore Production and Gathering and Boosting	Pneumatic Controllers
	Equipment Leaks/Fugitive Emissions
	Liquids Unloading
	Pneumatic pumps (only Chemical Injection Pumps (CIP))
	Tanks
Natural Gas (NG) Processing	Reciprocating Compressors-venting
	Centrifugal Compressors-venting
NG Transmission & Underground Storage	Reciprocating Compressors-venting
	Centrifugal Compressors-venting
	Equipment Leaks/Fugitive Emissions
	Pipeline Venting & Blowdowns
	Pneumatic Controllers
NG Distribution	M&R Stations/City Gates
	Mains – Cast Iron, Not Cathodically Protected Steel (Bare and Coated)
	Services
	Blowdowns
	Excavation Damages

<sup>15</sup> EPA may add new sources to this list in the future.



## Appendix 2: Proposed BMPs for BMP Commitment Option

The following table provides high-level information on recommended sources and corresponding BMPs that EPA is considering for inclusion in the BMP commitment option. EPA plans to continue to work through technical and implementation details with input from stakeholders and will include more specific BMP guidance in the final program proposal. The table also includes specific proposed exclusions to the company-wide implementation of best practices.<sup>16</sup>

Sectors	Sources	BMPs
Onshore Production and Gathering and Boosting	Pneumatic Controllers	For gas-driven pneumatic controllers, use low- (defined as gas bleed rate < 6 standard cubic feet/hour) or no-bleed controllers for all applications except those requiring high-bleed controllers for certain purposes, including operational requirements and safety.
	Equipment Leaks/ Fugitive Emissions	Undertake monitoring and repair activities, at specified minimum intervals, following defined parameters governing repair activities.
	Liquids Unloading	Reduce methane emissions from liquids unloading actions during which gas is vented.
	Pneumatic pumps (only CIP)	Implement no- or low-emitting pumps, such as solar or electric pumps, or route bleed gas to flare or gas capture/use.
	Hydrocarbon Storage Tanks	Route gas to capture/use (e.g., VRU) or route gas to flare.
Natural Gas (NG) Processing	Reciprocating Compressors-venting	Route rod packing vent to capture/use or route gas to flare or replace rod packing every 26,000 hours of operation or every 36 months.
	Centrifugal Compressors-venting	Route wet seal de-gassing vent to capture/use or route wet seal de-gassing to flare.

<sup>16</sup> This is additive to the proposal on page 6 that partners could request an exemption to full implementation for each source commitment. Such exemptions could be considered on the condition that the exempted sources (basically, those for which a mitigation option is not implemented) would not represent a significant portion of methane emissions from that source, and would be transparently documented in annual results to provide context for company achievements. EPA is requesting feedback on how to structure the potential exemption option.



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Sectors	Sources	BMPs															
NG Transmission & Underground Storage <sup>17</sup>	Reciprocating Compressors-venting	Same as above.															
	Centrifugal Compressors-venting	Same as above.															
	Compressor Station Equipment Leaks/ Fugitive Emissions	Undertake monitoring and repair activities, at specified minimum intervals, following defined parameters governing repair activities.															
	Pipeline Venting & Blowdowns	Maximize gas recovery and/or emission reductions through the use of a combination of in-line compression (when available) to maximum engineering potential, and route remaining gas to portable compression or flare. Excludes emergency blowdown situations.															
	Pneumatic Controllers	Same as above.															
NG Distribution	M&R Stations/City Gates	Undertake monitoring and repair activities, at specified minimum intervals, following defined parameters governing repair activities.															
	Mains – Cast Iron, Unprotected Steel	Replace/line/seal cast iron pipes or replace/cathodically protect unprotected steel pipes at a specified annual rate. EPA is evaluating the detailed specifications of this BMP and is requesting feedback on approach in general as well as the following proposal for rate of replacement received through Gas STAR Gold Feedback: <table><tr><th>Tier</th><th>Inventory of Cast Iron and Unprotected Steel Mains</th><th>% Annual Replacement</th></tr><tr><td>Tier 1</td><td>&lt;500 miles</td><td>6.50%</td></tr><tr><td>Tier 2</td><td>500 - 1,000 miles</td><td>5%</td></tr><tr><td>Tier 3</td><td>1,001 - 1,500 miles</td><td>3%</td></tr><tr><td>Tier 4</td><td>&gt; or = 1,500 miles</td><td>2%</td></tr></table>	Tier	Inventory of Cast Iron and Unprotected Steel Mains	% Annual Replacement	Tier 1	<500 miles	6.50%	Tier 2	500 - 1,000 miles	5%	Tier 3	1,001 - 1,500 miles	3%	Tier 4	> or = 1,500 miles	2%
	Tier	Inventory of Cast Iron and Unprotected Steel Mains	% Annual Replacement														
	Tier 1	<500 miles	6.50%														
	Tier 2	500 - 1,000 miles	5%														
	Tier 3	1,001 - 1,500 miles	3%														
Tier 4	> or = 1,500 miles	2%															
Services	Evaluation of BMPs in progress.																
High-Pressure Pipe Blowdowns	Maximize gas recovery and/or emission reductions through the use gas to capture/use, flaring, hot tapping, and/or squeezing.																
Excavation Damages	Reduce damages at target rate per thousand locate calls and shorten average time to shut-in for all damages by a minimum percentage.																

<sup>17</sup> EPA has received, and is considering, a proposal to structure BMP coverage of natural gastransmission and storage compressor stations as a Directed Inspection and Maintenance Program.



### Appendix 3: Proposed Organization Structure for BMP Commitments

This appendix offers proposed levels at which companies would make commitments under the Methane Challenge BMP commitment option.<sup>18</sup> To the extent that companies operate in more than one sector, they have the option to make BMP commitments in one or more sector. In considering this proposal, companies should note that they may have multiple facilities reporting to GHGRP Subpart W. Companies should also consider relevant regulations that cover their operations and the ability to demonstrate voluntary action within a given organizational structure.

EPA encourages stakeholders to provide feedback on these proposals.

Onshore Production: Division or Business Unit Level, defined as a separately managed division or unit of an enterprise with strategic and/or operational objectives that may be distinct from the parent unit and other divisions or business units. A division or business unit typically targets a specific market or business or operational concern, which requires a production or management specialty and approach.

Natural Gas (NG) Processing: Division or Business Unit Level, defined as a separately managed division or unit of an enterprise with strategic and/or operational objectives that may be distinct from the parent unit and other divisions or business units. A division or business unit targets a specific market or business or operational concern, which requires a production or management specialty and approach.

NG Transmission Compression and Underground Storage: a natural gas transmission company operating an inter- or intra-state transmission pipeline system as regulated/defined by FERC or an individual state.

NG Distribution: a local distribution company as regulated by a single state public utility commission.

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<sup>18</sup> One Future has its own parameters for partner participation.

**To:** Lacey, Pam[PLacey@aga.org]  
**Cc:** Gunning, Paul[Gunning.Paul@epa.gov]  
**From:** Bylin, Carey  
**Sent:** Thur 7/23/2015 7:27:10 PM  
**Subject:** RE: Is the Methane Challenge still coming out this afternoon?

Hi Pam,

Yes, thanks for checking, it should be released this afternoon.

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Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

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**From:** Lacey, Pam [mailto:PLacey@aga.org]  
**Sent:** Thursday, July 23, 2015 2:55 PM  
**To:** Bylin, Carey  
**Cc:** Gunning, Paul  
**Subject:** Is the Methane Challenge still coming out this afternoon?

Carey and Paul – Just checking – do you still plan to release the proposal this afternoon? thanks! -  
Pam

**Pamela A. Lacey | Senior Managing Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | [placey@aga.org](mailto:placey@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe delivery of clean natural gas to over 68 million customers throughout the nation.

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Mon 6/8/2015 2:25:09 PM  
**Subject:** RE: Next one future call

Yes, we are still planning on it. We would like to walk through with you the specific plans for EPA-One Future collaboration moving forward.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [mailto:tmichels@bwstrategies.com]  
**Sent:** Sunday, June 07, 2015 10:31 PM  
**To:** Bylin, Carey



**Subject:** Re: Next one future call

I'm not sure why I'm just seeing this but yes we are! I'm very sorry for not notifying you earlier.  
Does the time still work?

Tom Michels, Principal  
[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)  
Office - [202-589-0015](tel:202-589-0015)  
Direct - [202-589-1759](tel:202-589-1759)  
Mobile - [202-413-2059](tel:202-413-2059)

*Sent from my mobile. Please pardon any typos.*

On Jun 5, 2015, at 3:30 PM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

Hi Tom,

Hope you are well. Are we on for Monday at 3p?

---

Ms. Carey Bylin

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [<mailto:tmichels@bwstrategies.com>]

**Sent:** Thursday, June 04, 2015 10:21 AM

**To:** Bylin, Carey

**Subject:** Re: Next one future call

Works for me. Let me send that out and ensure we can get a critical mass.

Tom Michels, Principal  
[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)

Office - [202-589-0015](tel:202-589-0015)

Direct - [202-589-1759](tel:202-589-1759)

Mobile - [202-413-2059](tel:202-413-2059)

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On Jun 4, 2015, at 10:14 AM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

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How about Monday at 3p?

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U.S. Mail Address:  
Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

-----Original Message-----

From: Tom Michels [<mailto:tmichels@bwstrategies.com>]

Sent: Wednesday, June 03, 2015 4:19 PM

To: Bylin, Carey

Subject: RE: Next one future call

Carey-

Any news on the timing of our next call?

Tom Michels  
Executive Director  
ONE Future Coalition  
[www.onefuture.us](http://www.onefuture.us)

Principal,  
BlueWater Strategies llc  
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-----Original Message-----

From: Tom Michels

Sent: Tuesday, June 02, 2015 4:14 PM

To: 'Bylin, Carey'

Subject: RE: Next one future call

**(b)(6) personal privacy**

Thanks for reaching out on the meeting: either Monday or Tuesday work. In general, it would be good if we could do sometime post-11:00am on Monday, so that people can be out of their morning meetings. But ultimately, we'll work with whatever time you give us. Very keen to have the discussion. If you think we should do a pre-call, just call my cell whenever works for you.

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From: Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
Sent: Tuesday, June 02, 2015 4:10 PM  
To: Tom Michels  
Subject: Next one future call

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Carey Bylin

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Fri 6/5/2015 7:30:16 PM  
**Subject:** RE: Next one future call

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Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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To: 'Bylin, Carey'  
Subject: RE: Next one future call

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-----Original Message-----

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Sent: Tuesday, June 02, 2015 4:10 PM

To: Tom Michels

Subject: Next one future call

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Carey Bylin



**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Thur 6/4/2015 2:14:29 PM  
**Subject:** RE: Next one future call

Hi Tom,

How about Monday at 3p?

---

Ms. Carey Bylin  
International Programs Leader, Oil and Gas  
Natural Gas STAR Program  
Global Methane Initiative  
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Sent: Tuesday, June 02, 2015 4:14 PM  
To: 'Bylin, Carey'  
Subject: RE: Next one future call

## (b)(6) personal privacy

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From: Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
Sent: Tuesday, June 02, 2015 4:10 PM  
To: Tom Michels  
Subject: Next one future call

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Carey Bylin

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Tue 6/2/2015 8:10:28 PM  
**Subject:** Next one future call

hi Tom,

I wanted to get in touch to see if we might set up another call with one future. We'd like to discuss a bit more how we see the program playing out and also get to the question I mentioned to you previously. I'm (b)(6) personal privacy so I can't check availabilities, but was thinking maybe we could look to next Monday or Tuesday?

Carey Bylin

**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Tue 5/19/2015 5:08:55 PM  
**Subject:** RE: ONE Future call next week?

Thanks, Tom. I got your message about talking. I'm booked the rest of this afternoon, though I can try to call you after 4p. Otherwise, can we catch up tomorrow morning sometime?

Just to confirm, let's use this call-in for our meeting Thursday 2-3p:

Toll-free dial-in number (U.S. and Canada): Ex. 6 - Personal Privacy

International dial-in number: Ex. 6 - Personal Privacy

Conference code: Ex. 6 - Personal Privacy

---

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [mailto:tmichels@bwstrategies.com]

**Sent:** Monday, May 18, 2015 9:35 PM

**To:** Bylin, Carey

**Subject:** RE: ONE Future call next week?

Also, forgive me – I just realized that I completely forgot to send over the document to which I referred in my earlier note. See attached.

As to the long overdue questions, it would be good if you and I can take a few minutes so that I know what you have in mind in advance. That would help to ensure the least ambiguous answers... I'm around all day tomorrow if you have a few minutes. Thanks!

PS- we finally have a website: [www.onefuture.us](http://www.onefuture.us) check it out – would be grateful for any feedback you might have!

Tom Michels, Principal



BlueWater Strategies

25 Massachusetts Avenue, NW

Suite 820

Washington, DC 20001

[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)

Direct – 202-589-1759

Office – 202-589-0015

Mobile –202-413-2059

*This message may contain information that is privileged or confidential. If you receive this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.*

**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]

**Sent:** Monday, May 18, 2015 3:49 PM

**To:** Tom Michels

**Subject:** RE: ONE Future call next week?

Hi Tom,

Turns out we are having some trouble finding a time on Tuesday or Wednesday. Would Thursday work for the One Future group? We are open 10-11a or 2-3p on Thursday.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Tom Michels [<mailto:tmichels@bwstrategies.com>]

**Sent:** Friday, May 15, 2015 5:10 PM

**To:** Bylin, Carey

**Subject:** Re: ONE Future call next week?

Actually not - I was talking about the program description I think we sent in the last call. I'll send again when I get to a desk so you know what I'm referring to.

I like the MOU but it has not yet been blessed by the Board so it's still unofficial.

No worries on time - have a great weekend!

Tom Michels, Principal  
[tmichels@bwstrategies.com](mailto:tmichels@bwstrategies.com)

Office - 202-589-0015  
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*Sent from my mobile. Please pardon any typos.*

On May 15, 2015, at 5:02 PM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

Hi Tom,

Thanks so much for reaching out. We missed a week in terms of meeting and I definitely kept “meaning” to get in touch and set something up!

The items you suggest below sound good for an agenda. We also want to ask some long-overdue questions about the actual design of the One Future program and commitments. In terms of the “last document” you quote below, received a proposed EPA-One Future MOU – is that what you were referring to? Not sure if that came through official One Future channels so just want to be sure.

I’ll have to check first thing Monday for availability and will get back to you then. I hope that’s okay? Preliminarily Wed at 10:30a is looking best.

Have a great weekend.

---

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**From:** Tom Michels [<mailto:tmichels@bwstrategies.com>]

**Sent:** Thursday, May 14, 2015 3:18 PM

**To:** Bylin, Carey

**Subject:** ONE Future call next week?

Hi Carey,

Hope this note finds you well. I wanted to see if you and the team might have some time to do a call with ONE Future next week?

For once, I'm happy to report that we don't have any new shifts to report from our side. In terms of what we might hope to get from this call, I think we'd primarily be interested to hear about EPA's progress toward unveiling a draft proposal, any issues that we can either help with or need to be prepared for, and also to see if you have any additional feedback on our last document you might wish to share. Of course, if you have other or different issues to discuss we're happy to oblige.

Ideally, I was hoping that we might be able to schedule a call sometime on May 19 (open the whole day), or May 20 (open from 8:00am-1:30pm or from 4:00pm-5:30pm). Might you/your team have a window of availability in there?

Thanks and hope all is well!

-Tom

Tom Michels

Executive Director

**ONE Future Coalition**

Principal,

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**To:** Tom Michels[tmichels@bwstrategies.com]  
**From:** Bylin, Carey  
**Sent:** Mon 5/18/2015 7:48:52 PM  
**Subject:** RE: ONE Future call next week?

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**To:** Stacey Davis[SDavis@ccap.org]  
**Cc:** Laura Wang[LWang@ccap.org]  
**From:** Bylin, Carey  
**Sent:** Fri 5/15/2015 8:29:58 PM  
**Subject:** RE: Reminder: Climate Policy Initiative dialogue meeting next Tuesday

Hello Stacey and Laura,

Thank you for reaching out on this and my apologies for the delay in getting back to you. We really appreciate the invitation and I'll be pleased to participate in this event. I will not be available for the whole day. Is it okay if I arrive between 1p and 1:30p to join the methane/One Future session?

I look forward to seeing you then.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Stacey Davis [mailto:SDavis@ccap.org]  
**Sent:** Friday, May 15, 2015 2:47 PM  
**To:** Bylin, Carey  
**Cc:** Laura Wang  
**Subject:** FW: Reminder: Climate Policy Initiative dialogue meeting next Tuesday

Hi Carey,

As mentioned over the phone, CCAP is hosting a session on reducing emissions from existing oil and gas facilities at our Climate Policy Initiative dialogue meeting next week. The focus will be on the One Future proposal. (The full agenda is attached.) I hope you will be able to join us!

The address of the dialogue is 750 1<sup>st</sup> St., NE – adjacent to Union Station. Please arrive a few minutes early to give yourself ample time to go through building security. Breakfast will be available at 8:45. The dialogue will be held in the 9<sup>th</sup> floor Conference Rooms.

**If you have not already done so, please RSVP to Ms. Laura Wang at [lwang@ccap.org](mailto:lwang@ccap.org) by Friday, May 15<sup>th</sup>.**

We look forward to seeing you on Tuesday! Please let us know if you have any questions.

Best,

Stacey Davis

**Stacey Davis** | Senior Program Manager

[sdavis@ccap.org](mailto:sdavis@ccap.org)

**Center for Clean Air Policy (CCAP)**

750 First Street NE, Suite 940 | Washington, D.C. 20002

**Direct:** +1.202.350.8575

**Main:** +1.202.408.9260

**Mobile:** +1.202.280.4065



*Established in 1985, CCAP works with U.S. and international business and government leaders to secure climate change agreements that reduce greenhouse gas pollution. Please support our work through the Combined Federal Campaign (CFC) #71928.*



**To:** glenn.miller@centerpointenergy.com[glenn.miller@centerpointenergy.com]  
**From:** Elina Bouloubasis  
**Sent:** Mon 3/28/2016 8:37:07 PM  
**Subject:** Methane Challenge Partnership Agreement  
CenterPoint Energy\_signed pa.pdf

Dear Glenn,

Congratulations again and welcome to the U.S. Environmental Protection Agency (EPA)'s Natural Gas STAR Methane Challenge Program. Attached is your countersigned partnership agreement.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge partnership. Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis  
ERG - Contractor Support to the  
EPA's Methane Challenge Program



## Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

The Natural Gas STAR Methane Challenge Program is a flexible, voluntary partnership between the U.S. Environmental Protection Agency (EPA) and oil and natural gas companies. This voluntary Program allows the EPA to collaborate with Partners to promote and track ambitious, transparent commitments to voluntarily reduce methane emissions beyond regulatory requirements and to recognize Partners for their progress. By signing this agreement, CenterPoint Energy (company name) agrees to join the U.S. EPA to reduce methane emissions through a Best Management Practice (BMP) Commitment. The BMP Commitment entails a Partner commitment to company-wide implementation of BMPs to reduce methane emissions from key sources by a future target date. Partners commit to at least one emission source and specify a target year of completion (maximum of five [5] years from commitment start date).

**Partner's Best Management Practice Commitment:** Please specify participating sources, start date, and target achievement year in the table below; check all that apply. For companies joining at the corporate level that wish to make separate commitments for each of their subsidiaries/LDCs, please use "Appendix A: Commitment Table" found on the Methane Challenge Program website and submit in conjunction with this Partnership Agreement.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel (Commitment Rate: <u>5%</u> )	01/01/2016	<del>2032</del> 2017 CB
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns (Commitment Rate: <u>      </u> )		
<input type="checkbox"/> Excavation Damages		

\* Revision Confirmed by Partner 3-25-16.



## **EPA's Responsibilities**

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1. Assign a Methane Challenge Program Representative responsible for assisting the Partner in implementing the Program.
2. Provide relevant Program details, which can be found in the Natural Gas STAR Methane Challenge Program: BMP Framework and Methane Challenge BMP Supplemental Technical Information documents.
3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating the list of participating sources and mitigation options covered in the Program; and
  - (iv) answering questions about Program participation.
4. Encourage new and innovative methane emission mitigation technologies, as well as methodologies for monitoring and measuring progress, and incorporate them into the Program.
5. Track Partner progress through provision of a user-friendly reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge commitments. Supplementary data will be used in conjunction with data that are already collected by Subpart W of the Greenhouse Gas Reporting Program (GHGRP) to track Partner progress.
6. Promote the transparency and visibility of the Methane Challenge Program and member commitments and achievements, by publicly releasing non-confidential data that is submitted either through the Methane Challenge Program or through the GHGRP.
7. Acknowledge Program Partners through announcement of commitments, Implementation Plans, progress, and achievement of goals on the EPA's Methane Challenge website.

## **Natural Gas STAR Methane Challenge Partner's Responsibilities**

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1. Designate a company representative as the Natural Gas STAR Methane Challenge Program Implementation Manager responsible for serving as the contact point concerning implementation of this voluntary agreement.
2. Submit an Implementation Plan within six (6) months of signing this agreement outlining expected activities and milestones for achieving commitments.
3. Specify commitment start date(s), which will be within six (6) months of joining the Program.
4. Implement BMPs for the selected participating sources across company operations to achieve mitigation commitments by the specified commitment target year, not to exceed five (5) years from the specified commitment start date.
5. Report on an annual basis non-CBI supplementary data relevant to achieving Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GHGRP to demonstrate Partner progress within the Program.
6. Communicate participation to employees.

## **General Terms**

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1. This voluntary partnership is intended to promote and recognize voluntary actions taken by oil and gas companies to reduce methane emissions from their operations. It is understood that Partners to this Program may have operations covered by federal, state, and/or other regulatory requirements. It is anticipated that Partners may achieve their Methane Challenge Program commitments through a combination of voluntarily- and regulatorily-driven actions. Participation in this Program does not in any way change legal obligations of Partners to comply with applicable laws regulations.
2. This agreement can be terminated by either party at any time, with no notice or penalties and no further obligation. The EPA agrees not to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from Methane Challenge website. By setting out a target date on this form the Company does not intend to expose itself to regulatory liability if it cannot meet the target date.






3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

### Signatures and Partner Contact Details

Authorized Company Representative (name): Glenn D Miller

Signature:  Date: 03/22/2016

Authorized U.S. EPA Representative: Paul M. Gunning, Director, Climate Change Division

Signature:  Date: 3/25/2016

### Partner's Designated Natural Gas STAR Methane Challenge Implementation Manager:

Name: Glenn D Miller  
Title: Manager Environmental Programs  
Address: 501 West 61st Street  
City/State/Zip: Minneapolis, MN 55419  
Telephone/Fax: 612 861-870 E-mail: glenn.miller@centerpointenergy.com

### Instructions

Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M  
1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU  
Washington DC 20004

## Bylin, Carey

---

**From:** Miller, Glenn D. <glenn.miller@centerpointenergy.com>  
**Sent:** Friday, March 25, 2016 5:57 PM  
**To:** Bylin, Carey  
**Subject:** Re: EPA Natural Gas Star Methane Challenge Program Commitment

Sorry. 2017

Glenn D Miller  
CenterPoint Energy  
Mgr. Environmental Programs  
Natural Gas Operations  
O 612 861-8670  
C 612 910-1299

On Mar 25, 2016, at 11:45 AM, Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)> wrote:

Hello Glenn,

Thank you very much for this. We are in the process of countersigning the Partnership Agreements and will send you a fully executed version shortly.

I wanted to follow up on an item that we will need to correct on the Partnership Agreement. The Achievement Year is listed as "2032" for Mains. The Achievement Year must be within 5 years of the Start Date and it signifies the year you anticipate meeting your specified annual Mains replacement/rehabilitation rate (5%), which will be maintained on an on-going basis. I'm assuming that perhaps 2032 is when you anticipate completing your Mains replacement/rehabilitation? In any case, the Achievement Year must be within 5 years of the Start Date (e.g. between now and 2021). Can you provide a revised Achievement Year?

---

Ms. Carey Bylin  
International Programs Leader, Oil and Gas  
Natural Gas STAR Program  
Global Methane Initiative  
U.S. Environmental Protection Agency  
Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)  
1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:  
Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

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**From:** Miller, Glenn D. [<mailto:glenn.miller@centerpointenergy.com>]  
**Sent:** Wednesday, March 23, 2016 3:00 PM  
**To:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)  
**Cc:** Pam Lacey ([PLacey@aga.org](mailto:PLacey@aga.org)) <[PLacey@aga.org](mailto:PLacey@aga.org)>; Lanasa, Christopher T <[chris.lanasa@centerpointenergy.com](mailto:chris.lanasa@centerpointenergy.com)>; Bye, Richard T <[Richard.Bye@centerpointenergy.com](mailto:Richard.Bye@centerpointenergy.com)>  
**Subject:** EPA Natural Gas Star Methane Challenge Program Commitment

Dear Ms. Bylin,

As I informed you earlier, CenterPoint Energy is interested in becoming a charter member of the EPA Natural Gas Star Methane Challenge Program. Please find attached the signed Partnership Agreement stating our commitment.

CenterPoint Energy, Inc., headquartered in Houston, Texas, is a domestic energy delivery company that includes electric transmission & distribution, natural gas distribution and energy services operations. With more than 7,400 employees, CenterPoint Energy and its predecessor companies have been in business for more than 140 years. As a long time member (1999) of the EPA Natural Gas Star Program, we found this program an important tool to move forward with system improvements to not only ensure system safety but to minimize methane emissions. With this enhanced methane challenge, CenterPoint Energy intends to participate at the Best Management Practice (BMP) level with Cast Iron and Bare Steel replacement as the selected BMP method.

I will be participating in the upcoming Global Methane Launch Event next week along with CenterPoint Energy employee Chris LaNasa. My contact information is below.

The link to CenterPoint Energy's website is: [WWW.CenterPointEnergy.com](http://WWW.CenterPointEnergy.com)

Glenn D Miller  
CenterPoint Energy  
Mgr. Environmental Programs  
Natural Gas Operations  
O 612 861-8670  
C 612 910-1299

---

\*\*\*\*\* This email is from an external sender outside of the CenterPoint Energy network. Be cautious about clicking links or opening attachments from unknown sources. \*\*\*\*\*

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**To:** robert.bennett@atmosenergy.com[robert.bennett@atmosenergy.com];  
John.McDill@atmosenergy.com[John.McDill@atmosenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Mon 3/28/2016 6:57:27 PM  
**Subject:** RE: Methane Challenge Follow-Up

Hi Robert and John,

Are you able to provide us with the information below today?

Thank you!

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**From:** Elina Bouloubasis  
**Sent:** Tuesday, March 22, 2016 5:13 PM  
**To:** 'robert.bennett@atmosenergy.com' <robert.bennett@atmosenergy.com>;  
'John.McDill@atmosenergy.com' <John.McDill@atmosenergy.com>  
**Subject:** Methane Challenge Follow-Up

Mr. Bennett and Mr. McDill,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. However, we still need the

following items from you:

- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB Wednesday, March 23**. We understand you are unable to attend the Launch Event, but we will still announce your company and read the short bio at event to recognize you as a Founding Partner.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Pike, Paul R[PPike@ameren.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Colyer, Steve R[SColyer@ameren.com]  
**From:** Elina Bouloubasis  
**Sent:** Mon 3/28/2016 6:56:09 PM  
**Subject:** RE: Methane Challenge Follow-Up

Hi Paul,

I wanted to follow up and see if you're able to provide us with a brief bio today.

Thanks!

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Elina Bouloubasis  
**Sent:** Wednesday, March 23, 2016 4:55 PM  
**To:** Pike, Paul R <PPike@ameren.com>  
**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Colyer, Steve R <SColyer@ameren.com>  
**Subject:** RE: Methane Challenge Follow-Up

Hi Paul,

Thank you for the information! We're glad Ameren Illinois has joined the Methane Challenge Program! Although your company isn't able to attend the launch, could you please send a short bio for us to read out loud at the event?

Thanks again,

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Pike, Paul R [<mailto:PPike@ameren.com>]

**Sent:** Wednesday, March 23, 2016 4:51 PM

**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>

**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Colyer, Steve R <[SColyer@ameren.com](mailto:SColyer@ameren.com)>

**Subject:** RE: Methane Challenge Follow-Up

Alina,

Thank you the follow-up and Ameren Illinois would like to sign up for the Methane Challenge Program. Unfortunately, we will not be able to have a representative at the Launch Event, but in response to the requested information is the following:

- ☐ ☐ ☐ ☐ ☐ ☐ The signed partnership agreement is attached
- ☐ ☐ ☐ ☐ ☐ ☐ No participant at the launch
- ☐ ☐ ☐ ☐ ☐ ☐ No company bio for the launch

•□□□□□□□ Ameren Illinois, is the name that should be used to identify the company and the website is: <https://www.ameren.com/illinois>

If you have any questions please feel free to contact me.

Sincerely,

Paul Pike

**Paul PIKE** : : Consulting Environmental Scientist, Environmental Services : : T 314.554.2388 : : C 314.604.6905

**Ameren Services** : : 1901 Chouteau Avenue, P.O. Box 66149, MC 602 : : St. Louis, MO 63166

Please consider the environment before printing this e-mail. "Be the change you want to see in the world." M. Gandhi

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]

**Sent:** Wednesday, March 23, 2016 11:27 AM

**To:** Pike, Paul R

**Cc:** Bylin, Carey; Pryor, Justin

**Subject:** Methane Challenge Follow-Up

EXTERNAL SENDER. Do not click on links or open attachments that are not expected and do not give out User IDs or passwords.

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Mr. Pike,

Thank you for letting us know that you will be participating in the Methane Challenge Program. If you're still interested, we would need the following information from you:



- Partnership agreement
- Launch participant's name, title, and contact information (if attending the launch next week)
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

# Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** Georgetown University Hotel and Conference Center  
Washington, DC

**Agenda:**

**10:00 AM -10:05 AM**    **Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge

Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Richard Hyde[rhyde@aglresources.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Fiji George[Fiji\_George@SWN.com]; Franklin, Pamela[Franklin.Pamela@epa.gov]; Jim Kibler[jkibler@aglresources.com]  
**From:** Pryor, Justin  
**Sent:** Mon 4/18/2016 9:09:23 PM  
**Subject:** Re: Today's EPA-ONE Future Meeting

This sounds great, Richard. Thanks so much for the quick reply and we will look out for the document!

-Justin

On Apr 18, 2016, at 4:38 PM, Richard Hyde <[rhyde@aglresources.com](mailto:rhyde@aglresources.com)> wrote:

Carey, Pamela and Justin

Thanks again for the time today and especially since we ran over. I think there was some confusion on our part probably my rookie mistake and about the timeline on the STI. We have done an extensive review of the draft that y'all provided earlier. We will send that redlined document to COB tomorrow. We understand that this will not be the last time that we will see this, but in the spirit of moving the ball forward I think this will work. I know y'all will need time to digest it so maybe an agenda item next Monday can be to go over part of the draft.

**To:** Richard Hyde[rhyde@aglresources.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Fiji George[Fiji\_George@SWN.com]; Franklin, Pamela[Franklin.Pamela@epa.gov]  
**From:** Pryor, Justin  
**Sent:** Mon 4/18/2016 8:32:56 PM  
**Subject:** Re: Today's EPA-ONE Future Meeting

Hi Richard,

I hope to straighten out some of the tasks in the near term with respect to the STI doc. Keeping our tentative accelerated timeline in mind, we had thought it might reduce a round of review for you all if we took up the pen (if the changes discussed last week had not been completed yet). We are okay with accepting the revised STI from you this Friday, but we will then need to review and return with our comments for your subsequent review. This may affect the timeline, so we just wanted that to be clear.

Rather than update the document with the proposed changes discussed today, we ask that it only be updated with the agreed upon changes discussed last week (and if you already made redline changes to the intro to reflect that we are past the public feedback phase, those can be left in).

Thank you again for supplying the clarifying information today. We will take this week to evaluate the proposals.

Let us know if this is amenable, and if so, we will look to receive the revised STI by this Friday.

Respectfully,

Justin

On Apr 18, 2016, at 9:54 AM, Richard Hyde <[rhyde@aglresources.com](mailto:rhyde@aglresources.com)> wrote:

Carey

Thanks and it was my pleasure to meet you as well and I also appreciate the productive engagement.

Yes we will send a slide deck this morning like to help facilitate the discussion. I apologize that we didn't get it there Friday. The agenda you laid out is consistent with ours. Look forward to chatting.

**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
**Sent:** Monday, April 18, 2016 8:51 AM  
**To:** Richard Hyde  
**Cc:** Fiji George; Pryor, Justin; Franklin, Pamela  
**Subject:** Today's EPA-ONE Future Meeting

Hello Richard,

I hope you had a nice weekend. It was great to meet you last week and we really appreciated the productive engagement to move our discussions forward.

When we left the meeting on Wednesday, my understanding was that ONE Future would provide - by last Friday - a timeline for delivering the various materials/answers we discussed. Is that in process/coming soon? We thought that it would be a good use of our meeting today to go through the timeline. We could also use today's meeting to go through ONE proposed "optional methodologies" for LNG and Processing if you have the final list (one of the action items was for OF to confirm if the LNG and Processing documents we have are final or if some sources will come off the list as happened with T&C). We are also eager to receive the Supplementary Technical Information document that Terri Shires was marking up with our agreed changes.

Are there other items you were planning to discuss today? Please advise.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Richard Hyde [<mailto:rhyde@aglresources.com>]

**Sent:** Thursday, April 14, 2016 11:14 AM

**To:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>

**Cc:** Fiji George <[Fiji\\_George@SWN.com](mailto:Fiji_George@SWN.com)>

**Subject:**

Carey this is the latest drafts. The EPA –ONE Future should have my address in it instead of BlueWater.

Thanks again for the time yesterday. I think we are on a good path.

**Richard Hyde**

Managing Director

External Affairs and Public Policy

832-397-8501 office

832-457-2279 mobile

[rhyde@aglresources.com](mailto:rhyde@aglresources.com)



**EXTERNAL EMAIL – Caution, this message was sent from an external source.**



**To:** Booth, Kevin[Kevin.Booth@avistacorp.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Pryor, Justin  
**Sent:** Mon 4/4/2016 7:47:01 PM  
**Subject:** RE: [External] RE: Avista Utilities signed Partnership Agreement for the Natural Gas STAR Methane Challenge  
[Avista Utilities Partnership Agreement.pdf](#)

Good Afternoon Kevin,

Attached, please find the revised and signed Partnership Agreement for your files. If you have any further questions, please let me know.

Respectfully,

Justin

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

202-343-9258

**From:** Bylin, Carey  
**Sent:** Tuesday, March 29, 2016 5:04 PM  
**To:** Booth, Kevin <Kevin.Booth@avistacorp.com>  
**Cc:** Pryor, Justin <Pryor.Justin@epa.gov>  
**Subject:** RE: [External] RE: Avista Utilities signed Partnership Agreement for the Natural Gas STAR Methane Challenge

Kevin,

Great, thanks for the confirmation. I am out of the office for the rest of the week so Justin Pryor will send you the revised and signed copy next week.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Booth, Kevin [<mailto:Kevin.Booth@avistacorp.com>]

**Sent:** Tuesday, March 29, 2016 1:54 PM

**To:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>

**Subject:** RE: [External] RE: Avista Utilities signed Partnership Agreement for the Natural Gas STAR Methane Challenge

Hi Carey,

A start date of 9/30/16 works for us. Please revise the Partnership Agreement accordingly.

Thanks, Kevin

**Kevin Booth** | Avista Corp.  
509-495-4738 | 509-990-5915 (Cell) | 509-777-5892 (Fax)  
[kevin.booth@avistacorp.com](mailto:kevin.booth@avistacorp.com)

**From:** Bylin, Carey [<mailto:Bylin.Carey@epa.gov>]  
**Sent:** Friday, March 25, 2016 8:58 AM  
**To:** Booth, Kevin  
**Cc:** Simock, Debbie; Tyrie, Mary; Howard, Bruce; Webb, Jeff  
**Subject:** [External] RE: Avista Utilities signed Partnership Agreement for the Natural Gas STAR Methane Challenge

Hi Kevin,

Thank you very much for this. We are in the process of countersigning the documents and will send you a fully executed version shortly.

I wanted to follow up on one small detail that we will need to correct on the Partnership Agreement. The Start Date is listed as "2016" for Excavation Damages. The Start Date should be a specific date that is within six months of joining the Program, so the latest it can be is September 30, 2016. Are you okay with our recognizing your Start Date as 9/30/16? Or you can choose another date between the launch and that point. The significance of the start date is that is when companies need to start collecting the data they need to track commitments (though for founding partners comprehensive reporting will start for the 2017 calendar year).

If you are okay with this, I will hand-write the revisions to the Partnership Agreement. Please reply with your concurrence (if you agree) so we can have written confirmation in our file.

---

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



**From:** Booth, Kevin [<mailto:Kevin.Booth@avistacorp.com>]

**Sent:** Wednesday, March 23, 2016 3:42 PM

**To:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>

**Cc:** Simock, Debbie <[Debbie.Simock@avistacorp.com](mailto:Debbie.Simock@avistacorp.com)>; Tyrie, Mary <[Mary.Tyrie@avistacorp.com](mailto:Mary.Tyrie@avistacorp.com)>; Howard, Bruce <[Bruce.Howard@avistacorp.com](mailto:Bruce.Howard@avistacorp.com)>; Webb, Jeff <[Jeff.Webb@avistacorp.com](mailto:Jeff.Webb@avistacorp.com)>

**Subject:** Avista Utilities signed Partnership Agreement for the Natural Gas STAR Methane Challenge

Ms. Bylin,

Attached are the signed Partnership Agreement and Appendix A - Commitment Table for the Natural Gas STAR Methane Challenge Program. Avista has committed via this agreement to establishing a best management practice for documenting excavation damages in the local distribution companies it operates in the natural gas distribution sector. Avista will use the collected data to set a goal for reducing excavation damages and methane emissions from excavation damages.

Avista Utilities is involved in the production, transmission and distribution of energy. We provide energy services, electricity and natural gas to customers in eastern Washington, northern Idaho and parts of southern and eastern Oregon. Avista Utilities is an operating division of Avista Corp.

**Kevin Booth** | Avista Corp.  
509-495-4738 | 509-990-5915 (Cell) | 509-777-5892 (Fax)  
[kevin.booth@avistacorp.com](mailto:kevin.booth@avistacorp.com)

---

**USE CAUTION - EXTERNAL SENDER**

**Do not click on links or open attachments that are not familiar.**

**For questions or concerns, please e-mail [phishing@avistacorp.com](mailto:phishing@avistacorp.com)**



## Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

The Natural Gas STAR Methane Challenge Program is a flexible, voluntary partnership between the U.S. Environmental Protection Agency (EPA) and oil and natural gas companies. This voluntary Program allows the EPA to collaborate with Partners to promote and track ambitious, transparent commitments to voluntarily reduce methane emissions beyond regulatory requirements and to recognize Partners for their progress. By signing this agreement, Arista Utilities (company name) agrees to join the U.S. EPA to reduce methane emissions through a Best Management Practice (BMP) Commitment. The BMP Commitment entails a Partner commitment to company-wide implementation of BMPs to reduce methane emissions from key sources by a future target date. Partners commit to at least one emission source and specify a target year of completion (maximum of five [5] years from commitment start date).

**Partner's Best Management Practice Commitment:** Please specify participating sources, start date, and target achievement year in the table below; check all that apply. For companies joining at the corporate level that wish to make separate commitments for each of their subsidiaries/LDCs, please use "Appendix A: Commitment Table" found on the Methane Challenge Program website and submit in conjunction with this Partnership Agreement.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input type="checkbox"/> Mains – Cast Iron and Unprotected Steel (Commitment Rate: _____)		
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns (Commitment Rate: _____)		
<input checked="" type="checkbox"/> Excavation Damages	9/30/2016 JP.	2021

★ Revisions confirmed by Partner 3-29-16



## **EPA's Responsibilities**

---

1. Assign a Methane Challenge Program Representative responsible for assisting the Partner in implementing the Program.
2. Provide relevant Program details, which can be found in the Natural Gas STAR Methane Challenge Program: BMP Framework and Methane Challenge BMP Supplemental Technical Information documents.
3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating the list of participating sources and mitigation options covered in the Program; and
  - (iv) answering questions about Program participation.
4. Encourage new and innovative methane emission mitigation technologies, as well as methodologies for monitoring and measuring progress, and incorporate them into the Program.
5. Track Partner progress through provision of a user-friendly reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge commitments. Supplementary data will be used in conjunction with data that are already collected by Subpart W of the Greenhouse Gas Reporting Program (GHGRP) to track Partner progress.
6. Promote the transparency and visibility of the Methane Challenge Program and member commitments and achievements, by publicly releasing non-confidential data that is submitted either through the Methane Challenge Program or through the GHGRP.
7. Acknowledge Program Partners through announcement of commitments, Implementation Plans, progress, and achievement of goals on the EPA's Methane Challenge website.

## **Natural Gas STAR Methane Challenge Partner's Responsibilities**

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1. Designate a company representative as the Natural Gas STAR Methane Challenge Program Implementation Manager responsible for serving as the contact point concerning implementation of this voluntary agreement.
2. Submit an Implementation Plan within six (6) months of signing this agreement outlining expected activities and milestones for achieving commitments.
3. Specify commitment start date(s), which will be within six (6) months of joining the Program.
4. Implement BMPs for the selected participating sources across company operations to achieve mitigation commitments by the specified commitment target year, not to exceed five (5) years from the specified commitment start date.
5. Report on an annual basis non-CBI supplementary data relevant to achieving Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GHGRP to demonstrate Partner progress within the Program.
6. Communicate participation to employees.

## **General Terms**

---

1. This voluntary partnership is intended to promote and recognize voluntary actions taken by oil and gas companies to reduce methane emissions from their operations. It is understood that Partners to this Program may have operations covered by federal, state, and/or other regulatory requirements. It is anticipated that Partners may achieve their Methane Challenge Program commitments through a combination of voluntarily- and regulatorily-driven actions. Participation in this Program does not in any way change legal obligations of Partners to comply with applicable laws regulations.
2. This agreement can be terminated by either party at any time, with no notice or penalties and no further obligation. The EPA agrees not to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from Methane Challenge website. By setting out a target date on this form the Company does not intend to expose itself to regulatory liability if it cannot meet the target date.



3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

### Signatures and Partner Contact Details

Authorized Company Representative (name): BRUCE F. HOWARD  
Signature: [Signature] Date: 3/22/16

Authorized U.S. EPA Representative: Paul M. Gunning, Director, Climate Change Division  
Signature: [Signature] Date: 3/25/2016

### Partner's Designated Natural Gas STAR Methane Challenge Implementation Manager:

Name: Kevin Booth  
Title: Env Scientist  
Address: 1411 E Mission  
City/State/Zip: Spokane WA 99220-3727  
Telephone/Fax: 509 495-4738 E-mail: kevin.booth@aurstnrcorp.com

### Instructions

Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M  
1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU  
Washington DC 20004



**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Colyer, Steve R[SColyer@ameren.com]  
**From:** Pike, Paul R  
**Sent:** Mon 3/28/2016 8:34:31 PM  
**Subject:** RE: Methane Challenge Follow-Up

We are working on it and should have it to you tomorrow.

**PAUL PIKE** : : T 314.554.2388 : : C 314.604.6905

Please consider the environment before printing this e-mail.

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Monday, March 28, 2016 1:56 PM  
**To:** Pike, Paul R  
**Cc:** Bylin, Carey; Pryor, Justin; Colyer, Steve R  
**Subject:** RE: Methane Challenge Follow-Up

Hi Paul,

I wanted to follow up and see if you're able to provide us with a brief bio today.

Thanks!

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Elina Bouloubasis  
**Sent:** Wednesday, March 23, 2016 4:55 PM  
**To:** Pike, Paul R <[PPike@ameren.com](mailto:PPike@ameren.com)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Colyer, Steve R <[SColyer@ameren.com](mailto:SColyer@ameren.com)>  
**Subject:** RE: Methane Challenge Follow-Up

Hi Paul,

Thank you for the information! We're glad Ameren Illinois has joined the Methane Challenge Program! Although your company isn't able to attend the launch, could you please send a short bio for us to read out loud at the event?

Thanks again,

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Pike, Paul R [<mailto:PPike@ameren.com>]  
**Sent:** Wednesday, March 23, 2016 4:51 PM  
**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Colyer, Steve R <[SColyer@ameren.com](mailto:SColyer@ameren.com)>  
**Subject:** RE: Methane Challenge Follow-Up

Alina,

Thank you the follow-up and Ameren Illinois would like to sign up for the Methane Challenge Program. Unfortunately, we will not be able to have a representative at the Launch Event, but in response to the requested information is the following:

- The signed partnership agreement is attached
- No participant at the launch
- No company bio for the launch
- Ameren Illinois, is the name that should be used to identify the company and the website is: <https://www.ameren.com/illinois>

If you have any questions please feel free to contact me.

Sincerely,

Paul Pike

**Paul PIKE** : : Consulting Environmental Scientist, Environmental Services : : T 314.554.2388 : : C 314.604.6905

**Ameren Services** : : 1901 Chouteau Avenue, P.O. Box 66149, MC 602 : : St. Louis, MO 63166

Please consider the environment before printing this e-mail. "Be the change you want to see in the world." M. Gandhi

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]  
**Sent:** Wednesday, March 23, 2016 11:27 AM  
**To:** Pike, Paul R  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

EXTERNAL SENDER. Do not click on links or open attachments that are not expected and do not give out User IDs or passwords.

---

Mr. Pike,

Thank you for letting us know that you will be participating in the Methane Challenge Program. If you're still interested, we would need the following information from you:

- Partnership agreement
- Launch participant's name, title, and contact information (if attending the [launch](#) next week)
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:**                      **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** 'Elina Bouloubasis'[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Hill, John  
**Sent:** Mon 3/28/2016 6:57:37 PM  
**Subject:** RE: Methane Challenge Follow-Up

Sorry, I was getting some last minute comments... here is what I have. Let me know if this is what you are looking for and if it is similar to what others have provided.

Thanks!

John

Duke Energy Corporation is an energy company whose regulated utility operations serve approximately 24 million people across 6 states, including natural gas customers in Ohio and Kentucky. We are committing to the Excavation Damages, Mains and Services best management practices for natural gas distribution and becoming a Methane Challenge partner because reducing methane emissions is an important issue for our communities and customers we serve.

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Monday, March 28, 2016 2:54 PM  
**To:** Hill, John  
**Cc:** 'Bylin, Carey'  
**Subject:** RE: Methane Challenge Follow-Up

Hi John,

Are you still able to provide us with a brief bio today?

Thanks!

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Hill, John [<mailto:John.Hill@duke-energy.com>]

**Sent:** Friday, March 25, 2016 11:55 AM

**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>

**Cc:** 'Bylin, Carey' <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>

**Subject:** RE: Methane Challenge Follow-Up

Can I provide a write-up on Monday after I have a chance to review it with our communications folks?

Thanks!

John

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]

**Sent:** Friday, March 25, 2016 11:46 AM

**To:** Hill, John

**Cc:** 'Bylin, Carey'; 'Pryor, Justin'; Haysbert, John A; Stroben, Michael W; Denton, Diane V; Fleming, Sandy

**Subject:** RE: Methane Challenge Follow-Up



Hi John,

Thank you for the information. Can you please also send your company bio (noted in my previous email)?

Thanks!

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Hill, John [<mailto:John.Hill@duke-energy.com>]

**Sent:** Friday, March 25, 2016 11:14 AM

**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>

**Cc:** 'Bylin, Carey' <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; 'Pryor, Justin' <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Haysbert, John A <[John.Haysbert@duke-energy.com](mailto:John.Haysbert@duke-energy.com)>; Stroben, Michael W <[Michael.Stroben@duke-energy.com](mailto:Michael.Stroben@duke-energy.com)>; Denton, Diane V <[Diane.Denton@duke-energy.com](mailto:Diane.Denton@duke-energy.com)>; Fleming, Sandy <[Sandy.Fleming@duke-energy.com](mailto:Sandy.Fleming@duke-energy.com)>

**Subject:** RE: Methane Challenge Follow-Up

I apologize for the delay in responding... I believe Heath Shuler and/or John Haysbert will be attending on behalf of Duke Energy. Here is their contact information:

Heath Shuler

SVP Fed Government Affairs

550 SOUTH TRYON, DEC47D

DUKE ENERGY CENTER

[Heath.Shuler@duke-energy.com](mailto:Heath.Shuler@duke-energy.com)

John Haysbert

Fed Government Affairs Director

325 7TH ST NW SUITE 300

WASHINGTON, DC 20004

[John.Haysbert@duke-energy.com](mailto:John.Haysbert@duke-energy.com)

The company website for Duke Energy is [www.duke-energy.com](http://www.duke-energy.com)

Thanks!

*John A. Hill, Jr, PE*

*Director of Engineering*

*Duke Energy - Gas Operations*

*513-287-5345*

[john.hill@duke-energy.com](mailto:john.hill@duke-energy.com)

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]  
**Sent:** Wednesday, March 23, 2016 12:52 PM  
**To:** Stroben, Michael W; Hill, John  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

\*\*\* Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Mr. Stroben and Mr. Hill,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the [launch](#) event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB Wednesday, March 23**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

# Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

## **Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company*

*statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the  
EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Edmonds, Bill[Bill.Edmonds@nwnatural.com]; Bauer, Gary[Gary.Bauer@nwnatural.com]  
**From:** Moerlins, Mary  
**Sent:** Fri 3/25/2016 8:18:58 PM  
**Subject:** RE: [External]Methane Challenge Follow-Up

Hi Elina,

We are pleased to be participating in the challenge. Our company website is [www.nwnatural.com](http://www.nwnatural.com). Our brief introduction/bio is below. Please let me know if there is anything else that I can answer or address. Our two company representatives who will be in D.C. next week are Gary Bauer and Bill Edmonds. I have copied them here as well.

NW Natural is the largest independent natural gas utility in Oregon and southwest Washington. One of its core values is Environmental Stewardship, which includes the company's commitment to reducing the carbon intensity of its utility business. NW Natural, through collaboration with regulators, completed the replacement of all cast iron and bare steel pipe in 2015. As members of the Methane Challenge, the company will continue to improve operations to the benefit of its customers and the climate.

Best

Mary Moerlins

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Thursday, March 24, 2016 9:42 AM  
**To:** Moerlins, Mary  
**Cc:** bylin.carey@epa.gov; pryor.justin@epa.gov  
**Subject:** [External]Methane Challenge Follow-Up

Ms. Moerlins,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. As a reminder, we still need the following information from you:

- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:**                      **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
  
**Washington, DC**



**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Donatiello, Steven T.[Steven.Donatiello@thelacledegroup.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Hoeferlin, Craig R.[Craig.Hoeferlin@thelacledegroup.com]  
**From:** Elina Bouloubasis  
**Sent:** Fri 3/25/2016 7:24:17 PM  
**Subject:** RE: The Laclede Group - Methane Challenge - Founder's Day Attendance  
removed.txt

Hi Steve,

Thank you for the information! We look forward to seeing Mr. Hoeferlin next week.

-Elina

**From:** Donatiello, Steven T. [mailto:Steven.Donatiello@thelacledegroup.com]  
**Sent:** Friday, March 25, 2016 2:51 PM  
**To:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Hoeferlin, Craig R. <Craig.Hoeferlin@thelacledegroup.com>  
**Subject:** The Laclede Group - Methane Challenge - Founder's Day Attendance

Ms. Bouloubasis,

I am pleased to advise your that Mr. Craig Hoeferlin, VP Operations Services for the Laclede Group will be attending the Founding Partners event on March 30, 2016. Per your email, I have provided the requested information below:

●□□□□□□□□ Launch participant's name, title, and contact information

-

Mr. Craig Hoeferlin, VP Operations Services, 314-575-3950,

Craig.Hoeferlin@thelacledegroupp.com

- ☐☐☐☐☐☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner

### **The Laclede Group**

We believe in a world where energy enriches people's lives. Our mission is to make that idea a reality. Across the regions we serve, we at The Laclede Group dedicate ourselves to helping our 1.56 million residential, commercial and industrial customers across Missouri and Alabama to reach their personal and professional goals every day.

We are committed to upgrading pipelines across our regions to provide even safer and more reliable natural gas to our customers. Last year, we replaced 235 miles of pipeline, and plan to continue at this rate.

- ☐☐☐☐☐☐ Company website and company name that should be listed on our website

-

The Laclede Group, [www.TheLacledeGroup.com](http://www.TheLacledeGroup.com)

If you have any questions concerning this, please contact me.

## **Steve**

Steve Donatiello, P.E.

Environmental Engineer III

Laclede Gas Company

Environmental Compliance

5th Floor

700 Market Street \*\*\*I have a new address.\*\*\*

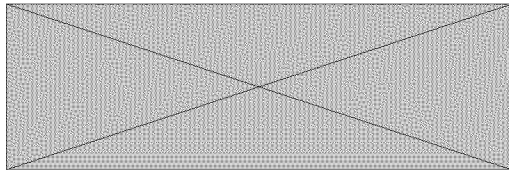
St. Louis, MO 63101

[steven.donatiello@TheLacledeGroup.com](mailto:steven.donatiello@TheLacledeGroup.com)

314-658-5541

314-307-5948 (cell) \*\*\*I have a new cell phone number.\*\*\*

314-535-9414 (fax)



**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]

**Sent:** Wednesday, March 23, 2016 4:27 PM

**To:** Donatiello, Steven T.

**Cc:** Bylin, Carey; Pryor, Justin

**Subject:** Methane Challenge Follow-Up

Mr. Donatiello,

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- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program



**To:** Adams, Melissa E[MelissaAdams@washgas.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Dallas, Sarah[SDallas@washgas.com]; Kelly, Hillery A[HKelly@washgas.com]  
**From:** Elina Bouloubasis  
**Sent:** Fri 3/25/2016 6:58:08 PM  
**Subject:** RE: Methane Challenge Follow-Up

Hi Melissa,

Thank you for the additional information! We will see you next week.

-Elina

**From:** Adams, Melissa E [mailto:MelissaAdams@washgas.com]  
**Sent:** Friday, March 25, 2016 2:46 PM  
**To:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Dallas, Sarah <SDallas@washgas.com>; Kelly, Hillery A <HKelly@washgas.com>  
**Subject:** RE: Methane Challenge Follow-Up

Elina,

Provided below is the information requested. Please let me know if you have any other questions. We are delighted to be participating and look forward to seeing you on Wednesday.

Thanks,

Melissa

**Launch participant's name, title, and contact information**

*Melissa E. Adams*

*Div. Head, Corporate Social Responsibility & Sustainability*

*Washington Gas*

*(703) 750-4530 Work*

*(703) 843-3664 Mobile*

*MelissaAdams@washgas.com*

*6801 Industrial Road*

*Springfield, VA 22151*

### **Short Company Bio**

*Washington Gas, a WGL company, has set two ambitious GHG emissions reduction targets for 2020. We are approaching a 70% absolute reduction in our 2008 baseline fleet and facilities emissions. We are also on pace to achieve an 18% reduction in GHG emissions for each unit of natural gas delivered to our 1.1 million customers. As a Founding Partner in EPA's Methane Challenge we underscore our corporate commitment to Sustainability and applaud EPA for its leadership.*

### **Company Name and Web Site**

*Washington Gas*

*<http://wgl.com/>*

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]  
**Sent:** Wednesday, March 23, 2016 5:43 PM  
**To:** Adams, Melissa E <[MelissaAdams@washgas.com](mailto:MelissaAdams@washgas.com)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Dallas, Sarah <[SDallas@washgas.com](mailto:SDallas@washgas.com)>; Kelly, Hillery A <[HKelly@washgas.com](mailto:HKelly@washgas.com)>  
**Subject:** Methane Challenge Follow-Up

Ms. Adams,

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- ☐ ☐ ☐ ☐ ☐ ☐ Company website and company name that should be listed on our website

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*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center**  
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## **Agenda:**

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*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

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Sincerely,

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ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Hoeferlin, Craig R.[Craig.Hoeferlin@thelacledegroupp.com]  
**From:** Donatiello, Steven T.  
**Sent:** Fri 3/25/2016 6:51:18 PM  
**Subject:** The Laclede Group - Methane Challenge - Founder's Day Attendance

Ms. Bouloubasis,

I am pleased to advise your that Mr. Craig Hoeferlin, VP Operations Services for the Laclede Group will be attending the Founding Partners event on March 30, 2016. Per your email, I have provided the requested information below:

● Launch participant's name, title, and contact information

-

Mr. Craig Hoeferlin, VP Operations Services, 314-575-3950,  
[Craig.Hoeferlin@thelacledegroupp.com](mailto:Craig.Hoeferlin@thelacledegroupp.com)

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### **The Laclede Group**

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We are committed to upgrading pipelines across our regions to provide even safer and more reliable natural gas to our customers. Last year, we replaced 235 miles of pipeline, and plan to continue at this rate.

- ☐☐☐☐☐☐ Company website and company name that should be listed on our website

-

The Laclede Group, [www.TheLacledeGroup.com](http://www.TheLacledeGroup.com)

If you have any questions concerning this, please contact me.

## Steve

Steve Donatiello, P.E.

Environmental Engineer III

Laclede Gas Company

Environmental Compliance

5th Floor

700 Market Street \*\*\*I have a new address.\*\*\*

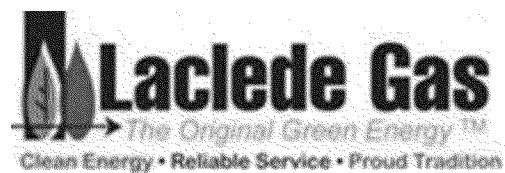
St. Louis, MO 63101

[steven.donatiello@TheLacledeGroup.com](mailto:steven.donatiello@TheLacledeGroup.com)

314-658-5541

314-307-5948 (cell) \*\*\*I have a new cell phone number.\*\*\*

314-535-9414 (fax)



**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Wednesday, March 23, 2016 4:27 PM  
**To:** Donatiello, Steven T.  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

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**Where:**                      **Georgetown University Hotel and Conference Center**  
  
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**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Dallas, Sarah[SDallas@washgas.com]; Kelly, Hillery A[HKelly@washgas.com]  
**From:** Adams, Melissa E  
**Sent:** Fri 3/25/2016 6:45:31 PM  
**Subject:** RE: Methane Challenge Follow-Up

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Melissa

**Launch participant's name, title, and contact information**

*Melissa E. Adams*

*Div. Head, Corporate Social Responsibility & Sustainability*

*Washington Gas*

*(703) 750-4530 Work*

*(703) 843-3664 Mobile*

*MelissaAdams@washgas.com*

*6801 Industrial Road*

*Springfield, VA 22151*

**Short Company Bio**

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## **Company Name and Web Site**

*Washington Gas*

*<http://wgl.com/>*

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]

**Sent:** Wednesday, March 23, 2016 5:43 PM

**To:** Adams, Melissa E <MelissaAdams@washgas.com>

**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Dallas, Sarah <SDallas@washgas.com>; Kelly, Hillery A <HKelly@washgas.com>

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If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** 'Elina Bouloubasis'[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Hill, John  
**Sent:** Fri 3/25/2016 3:55:07 PM  
**Subject:** RE: Methane Challenge Follow-Up

Can I provide a write-up on Monday after I have a chance to review it with our communications folks?

Thanks!

John

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Friday, March 25, 2016 11:46 AM  
**To:** Hill, John  
**Cc:** 'Bylin, Carey'; 'Pryor, Justin'; Haysbert, John A; Stroben, Michael W; Denton, Diane V; Fleming, Sandy  
**Subject:** RE: Methane Challenge Follow-Up

Hi John,

Thank you for the information. Can you please also send your company bio (noted in my previous email)?

Thanks!

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350



Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Hill, John [<mailto:John.Hill@duke-energy.com>]

**Sent:** Friday, March 25, 2016 11:14 AM

**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>

**Cc:** 'Bylin, Carey' <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; 'Pryor, Justin' <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>; Haysbert, John A <[John.Haysbert@duke-energy.com](mailto:John.Haysbert@duke-energy.com)>; Stroben, Michael W <[Michael.Stroben@duke-energy.com](mailto:Michael.Stroben@duke-energy.com)>; Denton, Diane V <[Diane.Denton@duke-energy.com](mailto:Diane.Denton@duke-energy.com)>; Fleming, Sandy <[Sandy.Fleming@duke-energy.com](mailto:Sandy.Fleming@duke-energy.com)>

**Subject:** RE: Methane Challenge Follow-Up

I apologize for the delay in responding... I believe Heath Schuler and/or John Haysbert will be attending on behalf of Duke Energy. Here is their contact information:

Heath Shuler

SVP Fed Government Affairs

550 SOUTH TRYON, DEC47D

DUKE ENERGY CENTER

[Heath.Shuler@duke-energy.com](mailto:Heath.Shuler@duke-energy.com)

John Haysbert

Fed Government Affairs Director

325 7TH ST NW SUITE 300

WASHINGTON, DC 20004

[John.Haysbert@duke-energy.com](mailto:John.Haysbert@duke-energy.com)

The company website for Duke Energy is [www.duke-energy.com](http://www.duke-energy.com)

Thanks!

*John A. Hill, Jr, PE*

*Director of Engineering*

*Duke Energy - Gas Operations*

*513-287-5345*

*[john.hill@duke-energy.com](mailto:john.hill@duke-energy.com)*

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]

**Sent:** Wednesday, March 23, 2016 12:52 PM

**To:** Stroben, Michael W; Hill, John

**Cc:** Bylin, Carey; Pryor, Justin

**Subject:** Methane Challenge Follow-Up

\*\*\* Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Mr. Stroben and Mr. Hill,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB Wednesday, March 23**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center**

## **Washington, DC**

### **Agenda:**

#### **10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

#### **10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

#### **10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

#### **10:35 AM – 10:40 AM    Closing remarks**

#### **10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be

announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Miller, Wade E.[Wade.Miller@pseg.com]; Ragula, George[George.Ragula@pseg.com]  
**From:** Smith, Geraldine A  
**Sent:** Fri 3/25/2016 2:41:05 PM  
**Subject:** RE: Methane Challenge Follow-Up

Elina,

Below is the information requested in your March 23<sup>rd</sup> email, submitted on behalf of Public Service Electric and Gas Company (PSE&G). Ralph LaRossa, PSE&G President & COO and AGA Board Chair will be attending the launch event and will be speaking on behalf of AGA. Wade Miller, Director of Gas Transmission and Distribution, copied here, will be participating on behalf of PSE&G. Below is PSE&G's Partner Statement, a link to the PSE&G website and Wade's contact information.

#### **Methane Challenge Launch Event- Partner Statement**

As New Jersey's oldest and largest publicly owned utility, PSE&G provides safe, highly reliable gas service to 1.8 million customers. We are proud to be a founding partner of the Methane Challenge and commit to accelerate the replacement of aging cast iron and unprotected steel mains and services. This strategy will reduce methane emissions, helping to ensure a safe, clean and reliable gas system well into the future.

<https://www.pseg.com>

Wade E. Miller, P.E.

Director Gas Transmission and Distribution Engineering

Public Service Electric and Gas Company

80 Park Plaza

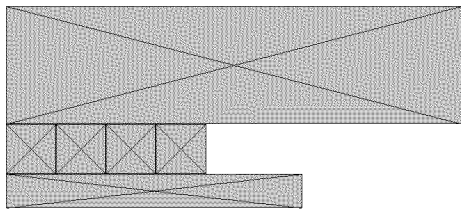
Newark, NJ 07101

973-430-5524

Please feel free to contact me by return email or by phone if you have any questions or require additional information.

Best regards,

Gerry Smith



**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Wednesday, March 23, 2016 1:46 PM  
**To:** Smith, Geraldine A; Ragula, George  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

**Email sent from outside of PSEG. Use caution before using links/attachments.**

---

Ms. Smith and Mr. Ragula,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the [launch](#) event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:**                      **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

### **Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*



**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge

Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

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**The information contained in this e-mail, including any attachment(s), is intended solely for use by the named addressee(s). If you are not the intended recipient, or a person designated as responsible for delivering such messages to the intended recipient, you are not authorized to disclose, copy, distribute or retain this message, in whole or in part, without written authorization from PSEG. This e-mail may contain proprietary, confidential or privileged information. If you have received this message in error, please notify the sender immediately. This notice is included in all e-mail messages leaving PSEG. Thank you for your cooperation.**

**To:** German, Keith[Keith.C.German@peoples-gas.com]  
**Cc:** Wojcik, Gary[gary.w.wojcik@peoples-gas.com]; Pavick, Alexius[ALEXIUS.M.PAVICK@peoples-gas.com]; Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Fri 3/25/2016 1:48:57 PM  
**Subject:** RE: Methane Challenge Founding Partners

Thank you! We have everything we need and will contact you if we have additional questions.

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** German, Keith [mailto:Keith.C.German@peoples-gas.com]  
**Sent:** Thursday, March 24, 2016 8:33 PM  
**To:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Cc:** Wojcik, Gary <gary.w.wojcik@peoples-gas.com>; Pavick, Alexius <ALEXIUS.M.PAVICK@peoples-gas.com>  
**Subject:** Methane Challenge Founding Partners

Attached is the information you requested. The contact for Peoples Natural Gas is Gary Wojcik (see email address below)

Please let us know if there are any questions. Thank you

Gary Wojcik

Phone work 1-412-208- Phone cell Ex. 6 - Personal Privacy [gary.w.wojcik@peoples-](mailto:gary.w.wojcik@peoples-)

**To:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** mbanas@nisource.com  
**Sent:** Thur 3/24/2016 9:38:37 PM  
**Subject:** Re: Methane Challenge Launch Event  
[pic00041.gif](#)

Thanks. Are we able to use the Methane Challenge logo as a Founding Partner? If not, that's okay. If so, can you send me a high-quality version? Thanks!

---

Mike Banas  
Director of Corporate Communications  
NiSource Inc.  
v: 219.647.5581  
c: (b)(6) personal privacy  
mbanas@nisource.com

From: "Bylin, Carey" <Bylin.Carey@epa.gov>  
To: "mbanas@nisource.com" <mbanas@nisource.com>,  
Date: 03/24/2016 10:18 AM  
Subject: Methane Challenge Launch Event

Hello Mike,

Good talking to you a minute ago. Below are the key points to consider for communications about the Methane Challenge launch. I've also confirmed we will be using the main EPA Facebook and Twitter accounts for social media. Please let me know if you have any other questions.

- Today at the Global Methane Forum in Washington D.C., EPA announced the launch of a new voluntary partnership program—the Natural Gas STAR Methane Challenge Program—with founding partner companies in the oil and gas sector.

- Companies participating in the Methane Challenge program are helping to realize valuable opportunities to reduce methane emissions, improve air quality, and capture this valuable resource.

- Through the Methane Challenge Program, partner companies have a platform to demonstrate their role as industry leaders by committing to adopt best management practices company-wide for key sources within five years.

- Through this program, partner companies have the capability to achieve significant voluntary reductions in a flexible and cost-effective

way.

- Transparency is a fundamental part of the Program, and partners will submit data directly to EPA to track their achievements over time.

- The Methane Challenge Program is an important part of the Obama Administration's strategy to reduce methane emissions from the oil and gas sector.

---

Ms. Carey Bylin  
International Programs Leader, Oil and Gas  
Natural Gas STAR Program  
Global Methane Initiative  
U.S. Environmental Protection Agency  
Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)  
1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:  
Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

(Embedded image moved to file: pic00041.gif)

**To:** ajhesselbach@peoplesgasdelivery.com[ajhesselbach@peoplesgasdelivery.com]; Keith.C.German@Peoples-Gas.com[Keith.C.German@Peoples-Gas.com]; morgan.obrien@peoples-gas.com[morgan.obrien@peoples-gas.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 9:05:32 PM  
**Subject:** RE: Methane Challenge Partnership Agreement

My apologies for the duplicate email, but can you please scan and email the agreement to me?

Thank you!

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**From:** Elina Bouloubasis  
**Sent:** Thursday, March 24, 2016 5:00 PM  
**To:** 'ajhesselbach@peoplesgasdelivery.com' <ajhesselbach@peoplesgasdelivery.com>; 'Keith.C.German@Peoples-Gas.com' <Keith.C.German@Peoples-Gas.com>; 'morgan.obrien@peoples-gas.com' <morgan.obrien@peoples-gas.com>  
**Cc:** 'Bylin, Carey' <Bylin.Carey@epa.gov>  
**Subject:** Methane Challenge Partnership Agreement

Hi all,

Thank you for providing EPA with the required information for the Methane Challenge Program. We look forward to seeing Mr. Wojcik next week!

When you have a moment, can you please send your partnership agreement to us?

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Wright, Adam L[ALWright@midamerican.com]; Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** McIvor, Jennifer  
**Sent:** Thur 3/24/2016 5:21:27 PM  
**Subject:** RE: Methane Challenge Follow-Up  
MidAmerican Energy MC Partnership Agreement.pdf

Please see the attached partnership agreement for MidAmerican Energy Company.

Thank you,

Jenny McIvor

**From:** McIvor, Jennifer  
**Sent:** Wednesday, March 23, 2016 6:19 PM  
**To:** Elina Bouloubasis  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** RE: [INTERNET] Methane Challenge Follow-Up

Elina,

I've provided responses to the second two items below. I am traveling today but will send the partnership agreement tomorrow, when I'm back in the office.

Thanks,

Jenny

----- Original message -----

From: Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>

Date: 3/23/2016 12:09 PM (GMT-06:00)

To: "McIvor, Jennifer" <[JMclvor@midamerican.com](mailto:JMclvor@midamerican.com)>



Cc: "Bylin, Carey" <Bylin.Carey@epa.gov>, "Pryor, Justin" <Pryor.Justin@epa.gov>

Subject: [INTERNET] Methane Challenge Follow-Up

This message originated outside of Berkshire Hathaway Energy's email system. Use caution if this message contains attachments, links or requests for information. Verify the sender before opening attachments, clicking links or providing information.

---

Ms. McIvor,

Thank you for letting us know that you will not be participating at the Methane Challenge Program Launch Event next week. However, we still need the following items from you:

- Partnership agreement
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner

MidAmerican Energy Company operates a natural gas distribution system serving 726,000 customers in Iowa, Illinois, Nebraska and South Dakota. The distribution system consists of more than 22,000 miles of mains and services pipeline. We own and operate transmission lines connecting our distribution system to interstate pipelines. We support the EPA's Methane Challenge Program by implementing excavation damages best management practices. These help ensure the integrity, reliability and efficiency of our gas pipeline operations.

- Company website and company name that should be listed on our website

MidAmerican Energy Company, midamericanenergy.com

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event. Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program



## Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

The Natural Gas STAR Methane Challenge Program is a partnership between the U.S. Environmental Protection Agency (EPA) and oil and natural gas industry. This voluntary program allows the EPA to collaborate with participants to promote and track, and transparent commitments to voluntarily reduce methane emissions beyond regulatory requirements and partners recognize their progress. By signing a partnership agreement, MidAmerican Energy Company (company name) agrees to join the U.S. EPA to reduce methane emissions through a Best Management Practice (BMP) Commitment. The BMP Commitment entails a Partner commitment to company-wide implementation of BMPs to reduce methane emissions from key sources by a future target date. Partners commit to source-specific methane emissions and specify a target year of completion (maximum of five [5] years from commitment start date).

**Partner's Best Management Practice Commitment:** Please specify participating sources, start date, achievement year in the table below; check company level that the corporate level that make separate commitments for each of their subsidiaries. Appendix A: Commitment Table found on the Methane Challenge Program website and submit with this Partnership Agreement.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/ Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure and Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/ Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure and Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/ Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/ City Gates		
<input type="checkbox"/> Mains - Cast Iron and Unprotected Steel (Commitment Rate: _____)		
<input type="checkbox"/> Services - Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns (Commitment Rate: _____)		
<input checked="" type="checkbox"/> Excavation Damages	09/29/2016	2021



## EPA's Responsibilities

1. Assign a Methane Challenge Representative responsible for assisting the Partner in implementing the Program.
2. Provide relevant Program details, which can include the Natural Gas STAR Methane Challenge Program BMP Framework and Methane Challenge BMP Supplemental Information documents.
3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating participating sources and mitigation options covered in the Program and
  - (iv) answering questions about Program participation.
4. Encourage new and innovative methane emission mitigation technologies as well as methodologies for monitoring and measuring progress and incorporate them into the Program.
5. Track Partner progress through provision of a reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge Commitments. Supplementary data will be used in conjunction with data that is already being collected by the Greenhouse Gas Reporting Program (GGRP) to track Partner progress.
6. Promote the transparency and visibility of the Program and Partner commitments and achievements, by publicly releasing non-confidential data either through the Methane Challenge Program or through the GGRP.
7. Acknowledge Program Partners through announcement of completion Plans, progress, achievement of goals on the EPA's Methane Challenge website.

## Natural Gas STAR Methane Challenge Partner's Responsibilities

1. Designate a company representative as the Natural Gas STAR Program Implementation Manager responsible for serving as the contact point for this voluntary agreement.
2. Submit an Implementation Plan within six (6) months of signing expected activities and milestones for achieving commitments.
3. Specify commitment start date (which will be within six (6) months of joining the Program).
4. Implement BMPs for the selected participating operations to achieve mitigation commitments by the specified commitment target year, not later than five (5) years from the specified commitment start date.
5. Report on an annual basis non-CBI supplementary data relevant to Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GGRP to demonstrate Partner participation in the Program.
6. Communicate participation to employees.

## General Terms

1. This voluntary partnership is intended to promote and recognize actions taken by oil and gas companies to reduce methane emissions from their operations. It is anticipated that Partners to this Program may have operations covered by federal, state, and/or local requirements. It is anticipated that Partners may achieve their Methane Challenge Program through a combination of voluntarily and regulatorily-driven actions. Participation in this Program may change legal obligations of Partners to comply with applicable laws and regulations.
2. This agreement can be terminated by either party at any time, without penalty and no further obligation. The EPA agrees to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from the Methane Challenge website. By signing this form the Company not intend to expose itself to regulatory liability if target cannot be met.




3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

### Signatures and Partner Contact Details

---

Authorized Company Representative (*name*): Adam L. Wright - Vice President, Gas Delivery

Signature: 

Date: 3/24/16

Authorized U.S. EPA Representative: *Paul M. Gunning, Director, Climate Change Division*

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Partner's Designated Natural Gas STAR Methane Challenge Implementation Manager:

Name: Jennifer McIvor

Title: Vice President, Environmental Programs

Address: 7215 Navajo Street

City/State/Zip: Council Bluffs, IA 51501

Telephone/Fax: 712-352-5434

E-mail: jmcivor@midamerican.com

### Instructions

---

Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M  
1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU  
Washington DC 20004

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Michael Rose  
**Sent:** Thur 3/24/2016 5:00:53 PM  
**Subject:** Re: Methane Challenge Follow-Up

Elina, Carey, Justin

Unfortunately, it appears as we will not be sending a representative to the event.

If you require further information, please feel free to contact me.

[Michael.Rose@kub.org](mailto:Michael.Rose@kub.org) | Regulatory Specialist | Knoxville Utilities Board  
4505 Middlebrook Pike | Knoxville TN 37921-5599  
(865) 558-2734  
[www.kub.org](http://www.kub.org) **Your Source for Energy and Water Services**

Disclaimer: This e-mail message, including any attachments, is intended for the person or entity to which it is addressed and may contain confidential or privileged information. Any unauthorized review, use, or disclosure is prohibited. If you are not the intended recipient, please contact the sender and destroy the original message and any copies. Thank you.

From: Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
To: "Michael.Rose@kub.org" <Michael.Rose@kub.org>, "brooke.sinclair@kub.org" <brooke.sinclair@kub.org>  
Cc: "bylin.carey@epa.gov" <bylin.carey@epa.gov>, "pryor.justin@epa.gov" <pryor.justin@epa.gov>  
Date: 03/24/2016 12:02 PM  
Subject: Methane Challenge Follow-Up

---

Ms. Sinclair and Mr. Rose,  
Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** Wednesday, March 30, 2016, 10:00-10:45AM  
Global Methane Forum Plenary Session, immediately following Policy Roundtable: Different Approaches to Methane Policies 08:30-10:00AM)

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** Georgetown University Hotel and Conference Center  
Washington, DC

**Agenda:**

**10:00 AM -10:05 AM Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM Closing remarks**

**10:40 AM - 10:45 AM Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

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Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis  
ERG - Contractor Support to the  
EPA's Methane Challenge Program

**To:** mary.moerlins@nwnatural.com[mary.moerlins@nwnatural.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 4:42:11 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Moerlins,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. As a reminder, we still need the following information from you:

- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ ☐ ☐ ☐ ☐ ☐ ☐ Company website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible.**

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**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

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*Downstream Initiative*

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*Introduce each partner in alphabetical order.*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Sid.McAnnally@onegas.com[Sid.McAnnally@onegas.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 4:32:18 PM  
**Subject:** Methane Challenge Follow-Up

Mr. McAnnally,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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(202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Jane R. Lewis-Raymond[jane.lewis-raymond@piedmontng.com]; Lacey, Pam[PLacey@aga.org]; Matt Kanes[matt.kanes@piedmontng.com]  
**From:** Alicia DePalma  
**Sent:** Thur 3/24/2016 4:10:59 PM  
**Subject:** RE: Methane Challenge Follow-Up

Piedmont Natural Gas Company, Inc.

<http://www.piedmontng.com/>

Piedmont Natural Gas Company, Inc., headquartered in Charlotte, NC, serves 1 million customers in North Carolina, South Carolina and Tennessee. We are investing significant resources into our pipeline integrity, safety and compliance programs, in addition to systems and technology infrastructure to enhance our overall pipeline system and integrity. Over the past five years, including this fiscal year 2016, we will have spent over \$1 billion dollars to that end, much of which is supported by our state utility commissions through integrity management riders. Although we have already completed a system-wide cast iron pipeline replacement program, Piedmont is committed with its industry peers to the Methane Challenge Program through implementation of additional best management practices.

**Alicia DePalma**

Environmental Engineer

Piedmont Natural Gas

4720 Piedmont Row Drive

Charlotte, NC 28210

(704) 731-4118 Office

(704) 763-9311 Mobile

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Thursday, March 24, 2016 10:50 AM

**To:** Alicia DePalma  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** RE: Methane Challenge Follow-Up

\*\*\* Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Hi Alicia,

Thanks for confirming that you're unable to attend the launch next week. However, we will still read the bios out loud even if you don't have a representative from your company there. Could you please provide me with the following items?

- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Thank you!

Elina

**From:** Alicia DePalma [<mailto:Alicia.DePalma@piedmontng.com>]  
**Sent:** Wednesday, March 23, 2016 2:33 PM  
**To:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>  
**Subject:** Re: Methane Challenge Follow-Up

I don't think we'll be able to have someone at the event next week. Thank you.

Sent from OWA on Android

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**From:** Elina Bouloubasis <[Elina.Bouloubasis@erg.com](mailto:Elina.Bouloubasis@erg.com)>  
**Sent:** Wednesday, March 23, 2016 1:40:47 PM

**To:** Alicia DePalma  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

\*\*\* Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Ms. DePalma,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

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*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Andy.McDonald@mdu.com[Andy.McDonald@mdu.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 4:08:33 PM  
**Subject:** Methane Challenge Follow-Up

Mr. McDonald,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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Sincerely,

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ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Michael.Rose@kub.org[Michael.Rose@kub.org];  
brooke.sinclair@kub.org[brooke.sinclair@kub.org]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 4:00:40 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Sinclair and Mr. Rose,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

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**To:** Kevin.booth@avistacorp.com[Kevin.booth@avistacorp.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 3:52:15 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Booth,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** jack.ihle@xcelenergy.com[jack.ihle@xcelenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 3:49:40 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Ihle,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor

(202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the  
EPA's Methane Challenge Program

**To:** kosnick@ugi.com[kosnick@ugi.com]; aharris@ugi.com[aharris@ugi.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 3:29:33 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Osnick and Ms. Harris,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** glenn.miller@centerpointenergy.com[glenn.miller@centerpointenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 3:15:11 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Miller,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

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**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

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*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**



**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** rfatzinger@SJINDUSTRIES.COM[rfatzinger@SJINDUSTRIES.COM];  
tturpin@sjindustries.com[tturpin@sjindustries.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 3:09:08 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Fatzinger and Mr. Turpin,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Alicia DePalma[Alicia.DePalma@piedmontng.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 2:49:42 PM  
**Subject:** RE: Methane Challenge Follow-Up

Hi Alicia,

Thanks for confirming that you're unable to attend the launch next week. However, we will still read the bios out loud even if you don't have a representative from your company there. Could you please provide me with the following items?

- [ ] Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- [ ] Company website and company name that should be listed on our website

Thank you!

Elina

**From:** Alicia DePalma [mailto:Alicia.DePalma@piedmontng.com]  
**Sent:** Wednesday, March 23, 2016 2:33 PM  
**To:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Subject:** Re: Methane Challenge Follow-Up

I don't think we'll be able to have someone at the event next week. Thank you.

Sent from OWA on Android

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**From:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Sent:** Wednesday, March 23, 2016 1:40:47 PM  
**To:** Alicia DePalma  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

\*\*\* Exercise caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Ms. DePalma,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**



**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Kcarmichael@NiSource.com[Kcarmichael@NiSource.com]  
**Cc:** pheystone@nisource.com[pheystone@nisource.com];  
mturman@nisource.com[mturman@nisource.com]; Bylin, Carey[Bylin.Carey@epa.gov]; Pryor,  
Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 2:43:03 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Carmichael,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** Wednesday, March 30, 2016, 10:00-10:45AM

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*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** Georgetown University Hotel and Conference Center  
Washington, DC

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** grassmyerd@dteenergy.com[grassmyerd@dteenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Thur 3/24/2016 2:34:04 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Grassmyer,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

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**Where:** **Georgetown University Hotel and Conference Center  
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**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** McIvor, Jennifer  
**Sent:** Wed 3/23/2016 11:19:13 PM  
**Subject:** RE: Methane Challenge Follow-Up

Elina,

I've provided responses to the second two items below. I am traveling today but will send the partnership agreement tomorrow, when I'm back in the office.

Thanks,  
Jenny

----- Original message -----

From: Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
Date: 3/23/2016 12:09 PM (GMT-06:00)  
To: "McIvor, Jennifer" <JMCIvor@midamerican.com>  
Cc: "Bylin, Carey" <Bylin.Carey@epa.gov>, "Pryor, Justin" <Pryor.Justin@epa.gov>  
Subject: [INTERNET] Methane Challenge Follow-Up

This message originated outside of Berkshire Hathaway Energy's email system. Use caution if this message contains attachments, links or requests for information. Verify the sender before opening attachments, clicking links or providing information.

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Ms. McIvor,

Thank you for letting us know that you will not be participating at the Methane Challenge Program Launch Event next week. However, we still need the following items from you:

- Partnership agreement
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner

MidAmerican Energy Company operates a natural gas distribution system serving 726,000 customers in Iowa, Illinois, Nebraska and South Dakota. The distribution system consists of more than 22,000 miles of mains and services pipeline. We own and operate transmission lines connecting our distribution system to interstate pipelines. We support the EPA's Methane Challenge Program by implementing excavation damages best management practices. These help ensure the integrity, reliability and efficiency of our gas pipeline operations.



- Company website and company name that should be listed on our website

MidAmerican Energy Company, midamericanenergy.com

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event. Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** jim\_cormack@transcanada.com[jim\_cormack@transcanada.com];  
randall\_schmidgall@transcanada.com[randall\_schmidgall@transcanada.com];  
chad\_edwards@transcanada.com[chad\_edwards@transcanada.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 10:13:57 PM  
**Subject:** Methane Challenge Follow-Up

Dear Mr. Cormack, Mr. Schmidgall, and Mr. Edwards,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

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**Where:**                      **Georgetown University Hotel and Conference Center**  
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**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]; Lockhart, Eileen  
P[Patricia.E.Lockhart@xcelenergy.com]; Martz, Stephen[Stephen.Martz@xcelenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Miller, Michael  
Allyn[Michaelallyn.miller@xcelenergy.com]  
**From:** Ihle, Jack  
**Sent:** Wed 3/23/2016 10:04:03 PM  
**Subject:** RE: Methane Challenge Follow-Up  
Xcel Energy confirming to join Methane Challenge as a Founding Partner

Elina,

I sent these items to you and Justin Pryor earlier today. I apologize, I may have misspelled your name on the original e-mail.

Attached is the earlier e-mail with the items you request.

Best,

Jack Ihle

**Xcel Energy | Responsible By Nature**

Director, Environmental Policy & Emerging Technology

1800 Larimer Street, 13<sup>th</sup> Floor Denver, CO 80202

P: 303.294.2262 F: 303.308.7691

E: [jack.ihle@xcelenergy.com](mailto:jack.ihle@xcelenergy.com)

---

**XCELENERGY.COM**

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Wednesday, March 23, 2016 3:54 PM  
**To:** Lockhart, Eileen P; Martz, Stephen  
**Cc:** Bylin, Carey; Pryor, Justin; Ihle, Jack; Miller, Michael Allyn  
**Subject:** Methane Challenge Follow-Up

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Mr. Martz and Ms. Lockhart,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the [launch](#) event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible.**

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:**                      **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
  
**Washington, DC**

### **Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,



Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Pryor, Justin[Pryor.Justin@epa.gov];  
ellina.bouloubasis@erg.com[ellina.bouloubasis@erg.com]  
**Cc:** Zich, Joni H[joni.h.zich@xcelenergy.com]; Butler, Pam  
H[Pam.H.Butler@XCELENERGY.COM]; West, Jeffrey L[jeffrey.l.west@xcelenergy.com]; Magno, Gary  
J[Gary.Magno@XCELENERGY.COM]; Martz, Stephen[Stephen.Martz@xcelenergy.com]; Miller, Michael  
Allyn[Michaelallyn.miller@xcelenergy.com]; Lacey, Pam[PLacey@aga.org]  
**From:** Ihle, Jack  
**Sent:** Wed 3/23/2016 7:31:44 PM  
**Subject:** Xcel Energy confirming to join Methane Challenge as a Founding Partner

Justin and Ellina,

This e-mail confirms Xcel Energy's intention to join Methane Challenge as a Founding Partner.

I understand that Cheryl Campbell, our SVP of Gas, already sent the signed Partnership Agreement to EPA. This e-mail completes the other tasks requested below by today, March 23:

- [ ] 75 Word Bio: "Xcel Energy is a major U.S. energy provider that powers millions of homes and businesses across eight Western and Midwestern states. As a member of the Natural Gas Star program since 2008, the company has deployed strategies to responsibly reduce methane emissions from its natural gas operations. By joining the Methane Challenge, the company plans to increase these efforts, applying the same commitment to reducing methane that it has used to achieve nationally recognized emission reductions from its electric operations."
- [ ] I will attend the event. My contact information is in my signature below.
- [ ] Our company website is: <http://www.xcelenergy.com/>
- [ ] Our company should be listed as "Xcel Energy" on the Methane Challenge Program website.
- [ ] I have already registered to attend the GMF.

Please let me know if you need anything else, or for any reason did not receive our Partnership Agreement.

Best,

Jack Ihle

**Xcel Energy | Responsible By Nature**

Director, Environmental Policy & Emerging Technology

1800 Larimer Street, 13<sup>th</sup> Floor Denver, CO 80202

P: 303.294.2262 F: 303.308.7691

E: [jack.ihle@xcelenergy.com](mailto:jack.ihle@xcelenergy.com)

---

**XCELENERGY.COM**

**From:** Pryor, Justin [mailto:Pryor.Justin@epa.gov]

**Sent:** Thursday, March 17, 2016 12:16 PM

**To:** Ihle, Jack

**Cc:** Bylin, Carey

**Subject:** RE: Xcel Energy preliminary intention to join Methane Challenge as a Founding Partner

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Hi Jack,

Excellent news!

Beyond tracking the GMF Agenda (which includes specifics on Methane Challenge launch

event) for updates and information regarding other sessions you may be interested in and able to attend, we sent out emails yesterday to each company that indicated interest in the program. In case you didn't receive the email or it found its way into your spam folder, I will provide the text of that email below (which indicates a few next steps as a founding partner), but please let me know if you have any additional questions (202-343-9258).

On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to hear of your interest in joining the Natural Gas STAR Methane Challenge Program as a founding partner. We will be officially launching this new program at the Global Methane Forum (GMF) at 10:00am on March 30, 2016 in Washington, D.C.

The launch event will be hosted by Janet McCabe, EPA's Acting Assistant Administrator for Air and Radiation. If you confirm your participation as a founding partner, we encourage you to attend this exciting event. We will recognize your company even if you are not able to participate in person. Please be aware of the following next steps:

- By March 23, please contact us (see contact information below) to confirm that you will be joining as a founding partner, and provide your signed Partnership Agreement.
- Provide us a short bio (approximately 75 words) describing your company, your commitments, and highlighting reasons for becoming a Methane Challenge partner.
- If your company plans to attend the Launch Event, provide the name, title, and contact information of the person who will be representing your company at the event and, if different, the contact information for the individual coordinating your company's participation at the event.
- Also, by March 23, please provide a link to your company's website as well as the specific way your company should be listed on the Methane Challenge Program website.
- Be sure to register for the GMF as soon as possible (<http://globalmethane.org/forum/>).

Please send the above information to myself and Elina Bouloubasis ([elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)). Once we receive confirmation of your participation, we will provide more specific details about the launch event agenda, which will include recognition of each partner and individual and group photos. Please note that due to time constraints, we do not anticipate that partner companies will be able to give individual remarks at the event.

As a new Methane Challenge Program partner, there are a few next steps to be aware of. Within six months after joining the Program, each partner must develop an Implementation Plan to provide details on their planned participation, such as anticipated rate of progress, key milestones, and other relevant context. See the following Guidelines document for more information about how to develop an Implementation Plan:

[http://www3.epa.gov/gasstar/documents/MC\\_IP\\_Guidelines\\_Final.pdf](http://www3.epa.gov/gasstar/documents/MC_IP_Guidelines_Final.pdf).

We will also be working with partners as we develop the Program's reporting system, and will be seeking input and feedback in the coming months. Finally, in an effort to further highlight our partners' accomplishments, we aim to work with partners to develop "Fact Sheets" that cover notable historical actions taken in advance of the Methane Challenge Program in efforts to mitigate methane emissions.

We encourage you to attend the full GMF event that will offer high-level plenary sessions on cross-cutting issues such as project financing, joint Global Methane Initiative (GMI)-Climate & Clean Air Coalition (CCAC) discussions on projects and policy, and ample opportunities for networking with methane experts in the public and private sectors from around the world. A draft agenda is available at <http://globalmethane.org/forum/>. We hope you are able to attend and participate in the sessions.

Please feel free to contact me or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions you may have about the Methane Challenge Partnership. Please contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event. Thank you again for your support of the Methane Challenge Program and we hope to see you at the launch event in Washington, D.C.

Respectfully,

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

**To:** patricia.e.lockhart@xcelenergy.com[patricia.e.lockhart@xcelenergy.com];  
Stephen.Martz@xcelenergy.com[Stephen.Martz@xcelenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov];  
jack.ihle@xcelenergy.com[jack.ihle@xcelenergy.com];  
michaelallyn.miller@xcelenergy.com[michaelallyn.miller@xcelenergy.com]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 9:53:46 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Martz and Ms. Lockhart,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- ☐ Launch participant's name, title, and contact information
- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program



**To:** MelissaAdams@washgas.com[MelissaAdams@washgas.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; SDallas@washgas.com[SDallas@washgas.com]; HKelly@washgas.com[HKelly@washgas.com]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 9:43:28 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Adams,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- ☐ ☐ ☐ ☐ ☐ ☐ Launch participant's name, title, and contact information
- ☐ ☐ ☐ ☐ ☐ ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ ☐ ☐ ☐ ☐ ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** amretherford@vectren.com[amretherford@vectren.com];  
Ebeck@Vectren.com[Ebeck@Vectren.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 9:33:16 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Retherford and Ms. Beck,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** steven.donatiello@TheLacledeGroup.com[steven.donatiello@TheLacledeGroup.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 9:27:17 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Donatiello,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) **as soon as possible**.

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Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Pike, Paul R[PPike@ameren.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Colyer, Steve R[SColyer@ameren.com]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 8:55:14 PM  
**Subject:** RE: Methane Challenge Follow-Up

Hi Paul,

Thank you for the information! We're glad Ameren Illinois has joined the Methane Challenge Program! Although your company isn't able to attend the launch, could you please send a short bio for us to read out loud at the event?

Thanks again,

Elina Bouloubasis

ERG

2300 Wilson Blvd, Suite 350

Arlington, VA 22201

P: 703.373.0149

E: [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)

**From:** Pike, Paul R [mailto:PPike@ameren.com]  
**Sent:** Wednesday, March 23, 2016 4:51 PM  
**To:** Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Colyer, Steve R <SColyer@ameren.com>  
**Subject:** RE: Methane Challenge Follow-Up

Alina,

Thank you the follow-up and Ameren Illinois would like to sign up for the Methane Challenge Program. Unfortunately, we will not be able to have a representative at the

Launch Event, but in response to the requested information is the following:

- ☐ The signed partnership agreement is attached
- ☐ No participant at the launch
- ☐ No company bio for the launch
- ☐ Ameren Illinois, is the name that should be used to identify the company and the website is: <https://www.ameren.com/illinois>

If you have any questions please feel free to contact me.

Sincerely,

Paul Pike

**Paul PIKE** : : Consulting Environmental Scientist, Environmental Services : : T 314.554.2388 : : C 314.604.6905

**Ameren Services** : : 1901 Chouteau Avenue, P.O. Box 66149, MC 602 : : St. Louis, MO 63166

Please consider the environment before printing this e-mail. "Be the change you want to see in the world." M. Gandhi

**From:** Elina Bouloubasis [<mailto:Elina.Bouloubasis@erg.com>]

**Sent:** Wednesday, March 23, 2016 11:27 AM

**To:** Pike, Paul R

**Cc:** Bylin, Carey; Pryor, Justin

**Subject:** Methane Challenge Follow-Up

EXTERNAL SENDER. Do not click on links or open attachments that are not expected and do not give out User IDs or passwords.

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Mr. Pike,

Thank you for letting us know that you will be participating in the Methane Challenge Program. If you're still interested, we would need the following information from you:

- Partnership agreement
- Launch participant's name, title, and contact information (if attending the [launch](#) next week)
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:**                                      **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                                      **Georgetown University Hotel and Conference Center**  
  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]; Colyer, Steve R[SColyer@ameren.com]  
**From:** Pike, Paul R  
**Sent:** Wed 3/23/2016 8:51:17 PM  
**Subject:** RE: Methane Challenge Follow-Up  
Ameren Illinois Methane Challenge Agreement 2016.pdf

Alina,

Thank you the follow-up and Ameren Illinois would like to sign up for the Methane Challenge Program. Unfortunately, we will not be able to have a representative at the Launch Event, but in response to the requested information is the following:

- ☐ The signed partnership agreement is attached
- ☐ No participant at the launch
- ☐ No company bio for the launch
- ☐ Ameren Illinois, is the name that should be used to identify the company and the website is: <https://www.ameren.com/illinois>

If you have any questions please feel free to contact me.

Sincerely,

Paul Pike

**Paul PIKE** : : Consulting Environmental Scientist, Environmental Services : : T 314.554.2388 : : C 314.604.6905

**Ameren Services** : : 1901 Chouteau Avenue, P.O. Box 66149, MC 602 : : St. Louis, MO 63166

Please consider the environment before printing this e-mail. "Be the change you want to see in the world." M. Gandhi

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Wednesday, March 23, 2016 11:27 AM  
**To:** Pike, Paul R  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

EXTERNAL SENDER. Do not click on links or open attachments that are not expected and do not give out User IDs or passwords.

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Mr. Pike,

Thank you for letting us know that you will be participating in the Methane Challenge Program. If you're still interested, we would need the following information from you:

- Partnership agreement
- Launch participant's name, title, and contact information (if attending the [launch](#) next week)
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

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*American Gas Association (AGA)*

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*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program



## Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

The Natural Gas STAR Methane Challenge Program is a flexible, voluntary partnership between the U.S. Environmental Protection Agency (EPA) and oil and natural gas companies. This voluntary Program allows the EPA to collaborate with Partners to promote and track ambitious, transparent commitments to voluntarily reduce methane emissions beyond regulatory requirements and to recognize Partners for their progress. By signing this agreement, Ameren Illinois Company (*company name*) agrees to join the U.S. EPA to reduce methane emissions through a Best Management Practice (BMP) Commitment. The BMP Commitment entails a Partner commitment to company-wide implementation of BMPs to reduce methane emissions from key sources by a future target date. Partners commit to at least one emission source and specify a target year of completion (maximum of five [5] years from commitment start date).

**Partner's Best Management Practice Commitment:** Please specify participating sources, start date, and target achievement year in the table below; check all that apply. For companies joining at the corporate level that wish to make separate commitments for each of their subsidiaries/LDCs, please use "Appendix A: Commitment Table" found on the Methane Challenge Program website and submit in conjunction with this Partnership Agreement.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: _____</i> )		
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input checked="" type="checkbox"/> Excavation Damages	03/30/2016	2020



## **EPA's Responsibilities**

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1. Assign a Methane Challenge Program Representative responsible for assisting the Partner in implementing the Program.
2. Provide relevant Program details, which can be found in the Natural Gas STAR Methane Challenge Program: BMP Framework and Methane Challenge BMP Supplemental Technical Information documents.
3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating the list of participating sources and mitigation options covered in the Program; and
  - (iv) answering questions about Program participation.
4. Encourage new and innovative methane emission mitigation technologies, as well as methodologies for monitoring and measuring progress, and incorporate them into the Program.
5. Track Partner progress through provision of a user-friendly reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge commitments. Supplementary data will be used in conjunction with data that are already collected by Subpart W of the Greenhouse Gas Reporting Program (GHGRP) to track Partner progress.
6. Promote the transparency and visibility of the Methane Challenge Program and member commitments and achievements, by publicly releasing non-confidential data that is submitted either through the Methane Challenge Program or through the GHGRP.
7. Acknowledge Program Partners through announcement of commitments, Implementation Plans, progress, and achievement of goals on the EPA's Methane Challenge website.

## **Natural Gas STAR Methane Challenge Partner's Responsibilities**

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1. Designate a company representative as the Natural Gas STAR Methane Challenge Program Implementation Manager responsible for serving as the contact point concerning implementation of this voluntary agreement.
2. Submit an Implementation Plan within six (6) months of signing this agreement outlining expected activities and milestones for achieving commitments.
3. Specify commitment start date(s), which will be within six (6) months of joining the Program.
4. Implement BMPs for the selected participating sources across company operations to achieve mitigation commitments by the specified commitment target year, not to exceed five (5) years from the specified commitment start date.
5. Report on an annual basis non-CBI supplementary data relevant to achieving Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GHGRP to demonstrate Partner progress within the Program.
6. Communicate participation to employees.

## **General Terms**

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1. This voluntary partnership is intended to promote and recognize voluntary actions taken by oil and gas companies to reduce methane emissions from their operations. It is understood that Partners to this Program may have operations covered by federal, state, and/or other regulatory requirements. It is anticipated that Partners may achieve their Methane Challenge Program commitments through a combination of voluntarily- and regulatorily-driven actions. Participation in this Program does not in any way change legal obligations of Partners to comply with applicable laws regulations.
2. This agreement can be terminated by either party at any time, with no notice or penalties and no further obligation. The EPA agrees not to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from Methane Challenge website. By setting out a target date on this form the Company does not intend to expose itself to regulatory liability if it cannot meet the target date.




3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

### Signatures and Partner Contact Details

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Authorized Company Representative (name): Ron Pate

Signature: 

Date: 03/23/2016

Authorized U.S. EPA Representative: *Paul M. Gunning, Director, Climate Change Division*

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Partner's Designated Natural Gas STAR Methane Challenge Implementation Manager:

Name: Steve Colyer

Title: Director, Gas Operations

Address: 370 S. Main Street

City/State/Zip: Decatur, IL 62523

Telephone/Fax: 217-424-6933

E-mail: scolyer@ameren.com

### Instructions

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Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M  
1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU  
Washington DC 20004

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Ameren Illinois Company

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source		Start Date	Achievement Year
<b>Onshore Production</b>			
<input type="checkbox"/>	Pneumatic Controllers		
<input type="checkbox"/>	Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/>	Liquids Unloading		
<input type="checkbox"/>	Pneumatic Pumps		
<input type="checkbox"/>	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>			
<input type="checkbox"/>	Pneumatic Controllers		
<input type="checkbox"/>	Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/>	Pneumatic Pumps		
<input type="checkbox"/>	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>			
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/>	Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>			
<input type="checkbox"/>	Reciprocating Compressors - Rod Packing Vent		
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<input type="checkbox"/>	Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/>	Pneumatic Controllers		
<b>NG Distribution</b>			
<input type="checkbox"/>	M&R Stations/City Gates		
<input type="checkbox"/>	Mains – Cast Iron and Unprotected Steel (Commitment Rate: _____)		
<input type="checkbox"/>	Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/>	Distribution Pipeline Blowdowns (Commitment Rate: _____)		
<input checked="" type="checkbox"/>	Excavation Damages	03/30/16	2020

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** McDonald, Andy  
**Sent:** Wed 3/23/2016 6:49:24 PM  
**Subject:** RE: Methane Challenge Follow-Up

Elina,

We will have that information to you by COB today. Just finalizing everything and double checking to see if anyone will be able to make it to the launch. Thank you.

Andy McDonald

Environmental Scientist

Montana-Dakota Utilities Co.

400 N. 4th Street

Bismarck, ND 58501

Phone: 701-222-7941

Fax: 701-222-7845

**From:** Elina Bouloubasis [mailto:Elina.Bouloubasis@erg.com]  
**Sent:** Wednesday, March 23, 2016 12:19 PM  
**To:** McDonald, Andy  
**Cc:** Bylin, Carey; Pryor, Justin  
**Subject:** Methane Challenge Follow-Up

\*\*\* This is an EXTERNAL email. Exercise caution. \*\*\*

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Mr. McDonald,

Thank you for your interest in the Methane Challenge Program. If you're able to attend the launch event next week, we still need the following items from you:

- Partnership agreement
- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

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*Downstream Initiative*

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Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Bylin, Carey[Bylin.Carey@epa.gov]; elina.bouloubasis@erg.com[elina.bouloubasis@erg.com]  
**Cc:** PLacey@aga.org[PLacey@aga.org]; mbanas@nisource.com[mbanas@nisource.com];  
mturman@nisource.com[mturman@nisource.com];  
pheyborne@nisource.com[pheyborne@nisource.com];  
clevander@nisource.com[clevander@nisource.com]  
**From:** KCarmichael@NiSource.com  
**Sent:** Wed 3/23/2016 6:07:13 PM  
**Subject:** Natural Gas STAR Methane Challenge - NiSource Partnership Agreement  
[Methane Challenge Partnership Agreement - NiSource.pdf](#)  
[Methane Challenge - NiSource Background.docx](#)

Carey,

Hope all is well. Please find attached the NiSource Natural Gas STAR Methane Challenge Partnership Agreement and bio/contact information/weblinks. See you next week. Thanks.

(See attached file: Methane Challenge Partnership Agreement - NiSource.pdf)

(See attached file: Methane Challenge - NiSource Background.docx)

Kelly R. Carmichael  
NiSource Environmental  
(219) 647-5312

## **NiSource Background**

### **EPA Natural Gas STAR Methane Challenge**

#### **Company Bio:**

NiSource Inc. is one of the largest fully-regulated utility companies in the United States, serving nearly 4 million natural gas and electric customers through its local Columbia Gas and NIPSCO brands. Our commitment of \$30 billion in infrastructure replacement programs are contributing to a significant reduction in methane emissions. We are proud to be a founding partner, and through the best management practices outlined in the Methane Challenge, we will further reduce emissions while improving safety and service to our customers and communities.

#### **Name, Title of Launch Event Attendee**

Mr. Kelly Carmichael

Vice President, Environmental

NiSource Inc. representing NiSource and the Columbia Gas and NIPSCO brands

219-647-5312 (office)

219-896-0503 (mobile)

kcarmichael@nsource.com

#### **Link to Company Website and Logos of Participating Companies:**

##### **NiSource Inc.**

[www.nsource.com](http://www.nsource.com)

##### **Columbia Gas of Maryland**

[www.ColumbiaGasMD.com](http://www.ColumbiaGasMD.com)

##### **Columbia Gas of Massachusetts**

[www.ColumbiaGasMA.com](http://www.ColumbiaGasMA.com)

##### **Columbia Gas of Ohio**

[www.ColumbiaGasOhio.com](http://www.ColumbiaGasOhio.com)

##### **Columbia Gas of Pennsylvania**

[www.ColumbiaGasPA.com](http://www.ColumbiaGasPA.com)

##### **Columbia Gas of Virginia**

[www.ColumbiaGasVA.com](http://www.ColumbiaGasVA.com)

##### **Northern Indiana Public Service Company (NIPSCO)**

[www.NIPSCO.com](http://www.NIPSCO.com)



COPY



## Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

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<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
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<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
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<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: &gt;1.5%</i> ) <sup>1</sup>	04/01/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input checked="" type="checkbox"/> Excavation Damages <sup>2</sup>		

1. NiSource corporate-level commitment is >1.5%. See Appendix A attachments for individual LDC commitment levels.

2. Excavation damage commitments are being made at the individual LDC level. See Appendix A attachments for individual LDC excavation damage commitments.



## **EPA's Responsibilities**

---

1. Assign a Methane Challenge Program Representative responsible for assisting the Partner in implementing the Program.
2. Provide relevant Program details, which can be found in the Natural Gas STAR Methane Challenge Program: BMP Framework and Methane Challenge BMP Supplemental Technical Information documents.
3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating the list of participating sources and mitigation options covered in the Program; and
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4. Encourage new and innovative methane emission mitigation technologies, as well as methodologies for monitoring and measuring progress, and incorporate them into the Program.
5. Track Partner progress through provision of a user-friendly reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge commitments. Supplementary data will be used in conjunction with data that are already collected by Subpart W of the Greenhouse Gas Reporting Program (GHGRP) to track Partner progress.
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7. Acknowledge Program Partners through announcement of commitments, Implementation Plans, progress, and achievement of goals on the EPA's Methane Challenge website.

## **Natural Gas STAR Methane Challenge Partner's Responsibilities**

---

1. Designate a company representative as the Natural Gas STAR Methane Challenge Program Implementation Manager responsible for serving as the contact point concerning implementation of this voluntary agreement.
2. Submit an Implementation Plan within six (6) months of signing this agreement outlining expected activities and milestones for achieving commitments.
3. Specify commitment start date(s), which will be within six (6) months of joining the Program.
4. Implement BMPs for the selected participating sources across company operations to achieve mitigation commitments by the specified commitment target year, not to exceed five (5) years from the specified commitment start date.
5. Report on an annual basis non-CBI supplementary data relevant to achieving Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GHGRP to demonstrate Partner progress within the Program.
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## **General Terms**

---

1. This voluntary partnership is intended to promote and recognize voluntary actions taken by oil and gas companies to reduce methane emissions from their operations. It is understood that Partners to this Program may have operations covered by federal, state, and/or other regulatory requirements. It is anticipated that Partners may achieve their Methane Challenge Program commitments through a combination of voluntarily- and regulatorily-driven actions. Participation in this Program does not in any way change legal obligations of Partners to comply with applicable laws regulations.
2. This agreement can be terminated by either party at any time, with no notice or penalties and no further obligation. The EPA agrees not to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from Methane Challenge website. By setting out a target date on this form the Company does not intend to expose itself to regulatory liability if it cannot meet the target date.



3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

### Signatures and Partner Contact Details

Authorized Company Representative (name): Joseph Hamrock, Chief Executive Officer

Signature: 

Date: 3/18/2012

Authorized U.S. EPA Representative: Paul M. Gunning, Director, Climate Change Division

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Partner's Designated Natural Gas STAR Methane Challenge Implementation Manager:

Name: Paul R. Heyborne

Title: Environmental Coordinator 3

Address: 801 E. 86th Avenue

City/State/Zip: Merrillville, IN 46410

Telephone/Fax: 219-647-5244

E-mail: pheyborne@nisource.com

### Instructions

Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M  
1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU  
Washington DC 20004

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Columbia Gas of Maryland (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 6.5%</i> )	4/1/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input type="checkbox"/> Excavation Damages		



## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Columbia Gas of Massachusetts (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 5.0%</i> )	4/1/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input checked="" type="checkbox"/> Excavation Damages	4/1/2016	2021

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Columbia Gas of Ohio (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 2.0%</i> )	4/1/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input type="checkbox"/> Excavation Damages		

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Columbia Gas of Pennsylvania (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 2.0%</i> )	4/1/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input type="checkbox"/> Excavation Damages		

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Columbia Gas of Virginia (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input checked="" type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate: 6.5%</i> )	4/1/2016	2021
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate: _____</i> )		
<input type="checkbox"/> Excavation Damages		

## Appendix A: Commitment Table

### Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment for Northern Indiana Public Service Company (*company name*)

Please specify participating sources, start date, and target achievement year in the table below; check all that apply. Please insert additional lines, as needed.

Source	Start Date	Achievement Year
<b>Onshore Production</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Liquids Unloading		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<b>Gathering and Boosting</b>		
<input type="checkbox"/> Pneumatic Controllers		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Pneumatic Pumps		
<input type="checkbox"/> Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>Natural Gas (NG) Processing</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<b>NG Transmission &amp; Underground Storage</b>		
<input type="checkbox"/> Reciprocating Compressors - Rod Packing Vent		
<input type="checkbox"/> Centrifugal Compressors - Venting		
<input type="checkbox"/> Equipment Leaks/Fugitive Emissions		
<input type="checkbox"/> Transmission Pipeline Blowdowns between Compressor Stations		
<input type="checkbox"/> Pneumatic Controllers		
<b>NG Distribution</b>		
<input type="checkbox"/> M&R Stations/City Gates		
<input type="checkbox"/> Mains – Cast Iron and Unprotected Steel ( <i>Commitment Rate:</i> _____)		
<input type="checkbox"/> Services – Cast Iron and Unprotected Steel		
<input type="checkbox"/> Distribution Pipeline Blowdowns ( <i>Commitment Rate:</i> _____)		
<input checked="" type="checkbox"/> Excavation Damages	4/1/2016	2021

**To:** bernie.beaudin@SWGAS.COM[bernie.beaudin@SWGAS.COM];  
thomas.radar@swgas.com[thomas.radar@swgas.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 6:00:43 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Beaudin and Mr. Radar,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program



**To:** david.mills@pse.com[david.mills@pse.com];  
Charlie.gadzik@pse.com[Charlie.gadzik@pse.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:53:52 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Gadzik and Mr. Mills,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

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**When:** Wednesday, March 30, 2016, 10:00-10:45AM

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Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Geraldine.smith@pseg.com[Geraldine.smith@pseg.com];  
george.ragula@pseg.com[george.ragula@pseg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:45:30 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Smith and Mr. Ragula,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- ☐ Launch participant's name, title, and contact information
- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

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*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM Introduce Program Partners**

*Introduce each partner in alphabetical order.*

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Alicia.Depalma@piedmontng.com[Alicia.Depalma@piedmontng.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:40:47 PM  
**Subject:** Methane Challenge Follow-Up

Ms. DePalma,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

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- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
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**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

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**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

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*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

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**10:40 AM - 10:45 AM    Group Photo**

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Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Medford, Ruth K.[Ruth.Medford@nationalgrid.com]; Chahbazpour, Donald[Donald.Chahbazpour@nationalgrid.com]; Bennett, Thomas E.[Thomas.Bennett@nationalgrid.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:26:07 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Medford, Mr. Chahbazpour, and Mr. Bennett,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Elina Bouloubasis[Elina.Bouloubasis@erg.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** McIvor, Jennifer  
**Sent:** Wed 3/23/2016 5:24:50 PM  
**Subject:** RE: Methane Challenge Follow-Up

Thanks, Elina. I'll follow up with these items as soon as possible.  
Jenny McIvor

----- Original message -----

From: Elina Bouloubasis <Elina.Bouloubasis@erg.com>  
Date: 3/23/2016 12:09 PM (GMT-06:00)  
To: "McIvor, Jennifer" <JMCIvor@midamerican.com>  
Cc: "Bylin, Carey" <Bylin.Carey@epa.gov>, "Pryor, Justin" <Pryor.Justin@epa.gov>  
Subject: [INTERNET] Methane Challenge Follow-Up

This message originated outside of Berkshire Hathaway Energy's email system. Use caution if this message contains attachments, links or requests for information. Verify the sender before opening attachments, clicking links or providing information.

---

Ms. McIvor,

Thank you for letting us know that you will not be participating at the Methane Challenge Program Launch Event next week. However, we still need the following items from you:

- Partnership agreement
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event. Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Andy.McDonald@mdu.com[Andy.McDonald@mdu.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:19:12 PM  
**Subject:** Methane Challenge Follow-Up

Mr. McDonald,

Thank you for your interest in the Methane Challenge Program. If you're able to attend the launch event next week, we still need the following items from you:

- ☐ Partnership agreement
- ☐ Launch participant's name, title, and contact information
- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** Wednesday, March 30, 2016, 10:00-10:45AM

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:**                      **Georgetown University Hotel and Conference Center**  
**Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*



Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** jmcivor@midamerican.com[jmcivor@midamerican.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:09:24 PM  
**Subject:** Methane Challenge Follow-Up

Ms. McIvor,

Thank you for letting us know that you will not be participating at the Methane Challenge Program Launch Event next week. However, we still need the following items from you:

- ☐ Partnership agreement
- ☐ Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- ☐ Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event. Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

## EPA's Methane Challenge Program

**To:** melanie.dickersbach@exeloncorp.com[melanie.dickersbach@exeloncorp.com]; michael.heffron@exeloncorp.com[michael.heffron@exeloncorp.com]; Brady, William J:(BSC)[williamj.brady@exeloncorp.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 5:00:56 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Dickersbach, Mr. Heffron and Mr. Brady,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

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**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
Washington, DC**

**Agenda:**

**10:00 AM -10:05 AM    Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM    Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

If you haven't yet registered for the Global Methane Forum, please do so as soon as possible at <http://globalmethane.org/forum/>. On the day of the event, staff will be available at the registration desk to answer questions and provide assistance.

Please feel free to contact Carey Bylin (202-343-9669 or [bylin.carey@epa.gov](mailto:bylin.carey@epa.gov)) or Justin Pryor (202-343-9258 or [pryor.justin@epa.gov](mailto:pryor.justin@epa.gov)) with any questions about the Methane Challenge Partnership and contact Elina Bouloubasis (703-373-0149 or [elina.bouloubasis@erg.com](mailto:elina.bouloubasis@erg.com)) with any questions about the launch event.

Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Michael.stroben@duke-energy.com[Michael.stroben@duke-energy.com]; john.hill@duke-energy.com[john.hill@duke-energy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 4:52:02 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Stroben and Mr. Hill,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. If you're able to attend the launch event next week, we still need the following items from you:

- Launch participant's name, title, and contact information
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB Wednesday, March 23**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

## Methane Challenge Program Launch Event

**When:** **Wednesday, March 30, 2016, 10:00-10:45AM**

**Global Methane Forum Plenary Session, immediately following Policy Roundtable:  
Different Approaches to Methane Policies 08:30-10:00AM)**

*\*Reserved seating at the front of the room for Methane Challenge Founding Partners.*

**Where:** **Georgetown University Hotel and Conference Center  
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**Agenda:**

**10:00 AM -10:05 AM Welcome remarks**

*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM Brief Remarks from Supportive Industry Associations**

*American Gas Association (AGA)*

*Downstream Initiative*

**10:15 AM - 10:35 AM Introduce Program Partners**

*Introduce each partner in alphabetical order.*

*Read brief partner statements (30 seconds pre partner) that summarizes the company's business and their planned commitment as a Methane Challenge partner. While the short company statement is being read, each partner representative walks on stage and shakes hands with Janet McCabe [pause for individual photo]*

**10:35 AM – 10:40 AM Closing remarks**



**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

Additionally, from 12:30 - 1:30 pm, there will be an informal opportunity for you to discuss the Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** linda.hilbert@cmsenergy.com[linda.hilbert@cmsenergy.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 4:44:57 PM  
**Subject:** Methane Challenge Follow-Up

Ms. Hilbert,

Congratulations! On behalf of the U.S. Environmental Protection Agency (EPA), I am pleased to welcome you to the Natural Gas STAR Methane Challenge Program. The Partnership Agreement between your company and the U.S. EPA signifies your intent to undertake and document ambitious voluntary methane emission reductions. We will be countersigning the Partnership Agreement and providing you with a final version shortly.

In addition, thank you for sending the requested information to us. Below is the Launch Event Agenda for an understanding of how the event will be structured.

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**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

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**10:15 AM - 10:35 AM    Introduce Program Partners**

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** PPike@ameren.com[PPike@ameren.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]  
**From:** Elina Bouloubasis  
**Sent:** Wed 3/23/2016 4:27:03 PM  
**Subject:** Methane Challenge Follow-Up

Mr. Pike,

Thank you for letting us know that you will be participating in the Methane Challenge Program. If you're still interested, we would need the following information from you:

- Partnership agreement
- Launch participant's name, title, and contact information (if attending the launch next week)
- Short bio (approximately 75 words) describing your company, commitments, and highlighting reasons for becoming a Methane Challenge Partner
- Company website and company name that should be listed on our website

Please be sure to provide these items to me ([Elina.bouloubasis@erg.com](mailto:Elina.bouloubasis@erg.com)) by **COB today**, if possible.

Below is the Launch Event Agenda for an understanding of how the event will be structured.

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**When:** Wednesday, March 30, 2016, 10:00-10:45AM

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**Agenda:**

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*Janet McCabe, Acting Assistant Administrator for Air and Radiation, US EPA*

**10:05 AM -10:15 AM    Brief Remarks from Supportive Industry Associations**

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**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

*Group photo (all companies) with Janet McCabe on the stage*

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Methane Challenge with EPA representatives—we hope you can attend! (The location will be announced at the Launch Event.)

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Thank you again for your support of the Methane Challenge Program and we look forward to working with you.

Sincerely,

Elina Bouloubasis

ERG - Contractor Support to the

EPA's Methane Challenge Program

**To:** Lacey, Pam[PLacey@aga.org]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]; Cameron-Dukes, Donise A.[Donise.Cameron@pseg.com]; Rubin, Jake[JRubin@aga.org]  
**From:** Pryor, Justin  
**Sent:** Tue 3/22/2016 7:51:24 PM  
**Subject:** RE: Methane Challenge Launch Event

Thanks, Pam. That should be no problem to get the individual photo after the AGA photo.

-Justin

**From:** Lacey, Pam [mailto:PLacey@aga.org]  
**Sent:** Tuesday, March 22, 2016 3:46 PM  
**To:** Pryor, Justin <Pryor.Justin@epa.gov>  
**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Cameron-Dukes, Donise A. <Donise.Cameron@pseg.com>; Rubin, Jake <JRubin@aga.org>  
**Subject:** RE: Methane Challenge Launch Event

Hi Justin – PSEG does plan to send another person (a director) to represent PSEG, as Mr. LaRossa will be there as Board Chairman representing AGA. So for AGA's *American Gas* magazine, we would like to get an individual photo of Ralph LaRossa with Janet McCabe. I am copying Donise Cameron at PSEG and our AGA communications director Jake Rubin to loop them in. thanks! - Pam

**Pamela A. Lacey | Chief Regulatory Counsel**

**Office of General Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | [placey@aga.org](mailto:placey@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.



**From:** Pryor, Justin [<mailto:Pryor.Justin@epa.gov>]  
**Sent:** Tuesday, March 22, 2016 3:37 PM  
**To:** Lacey, Pam <[PLacey@aga.org](mailto:PLacey@aga.org)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>  
**Subject:** FW: Methane Challenge Launch Event

Hi Pam,

The registration desk will be open by (and before) 8:30. The plenary roundtable that precedes our event begins at 8:30, so attendees of that will have registered in advance.

In response to the request for the two pictures, that should be no problem. We will plan to set up the AGA members/Janet photo after the overall group is taken. As far as the individual picture of the Chairman and Janet, each company representative will be going up on stage and getting an individual photo with Janet. Since Mr. LaRossa will be representing PSEG (correct?), he will get the individual photo with Janet as PSEG is called up to be recognized. If someone else is planning on going up for PSEG, I'm sure we can get the individual shot after the AGA shot.

With regard to the time for remarks, we will be maintaining our original agenda and sticking with five minutes for both AGA and DSI. We are also looking to cap the number of speakers to two, as three within five minutes seems excessive.

Let me know if there is anything else I can answer/assist with.

Respectfully,

Justin

**From:** Lacey, Pam [<mailto:PLacey@aga.org>]  
**Sent:** Tuesday, March 22, 2016 12:32 PM  
**To:** Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Rubin, Jake <[JRubin@aga.org](mailto:JRubin@aga.org)>; Traweek, Lori <[LTraweek@aga.org](mailto:LTraweek@aga.org)>  
**Subject:** RE: Methane Challenge Launch Event

Justin – Thank you. This is very helpful. Could we please have 10 minutes of the 15 minutes you have allocated for “Industry Associations.” DSI is a small subset of AGA members, all of whom are included in the AGA group. And we have our Chairman of the Board traveling to Washington for this event and probably our Vice Chairman of the Board flying in from Oklahoma (who also chairs the Board Natural Gas Emissions Task Force and will be Board Chairman next year). I would like to make it worth their while.

We are all looking forward to the event! - Pam

**Pamela A. Lacey | Chief Regulatory Counsel**

**Office of General Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | [placey@aga.org](mailto:placey@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

**From:** Pryor, Justin [<mailto:Pryor.Justin@epa.gov>]  
**Sent:** Tuesday, March 22, 2016 12:24 PM  
**To:** Lacey, Pam <[PLacey@aga.org](mailto:PLacey@aga.org)>

**Cc:** Bylin, Carey <Bylin.Carey@epa.gov>; Rubin, Jake <JRubin@aga.org>; Traweek, Lori <LTraweek@aga.org>

**Subject:** RE: Methane Challenge Launch Event

Hi Pam,

Hope the below helps, but again, let me know if there is anything further info you or the speakers might need.

With regard to the first three bulleted questions, I'll refer to the draft Event Agenda:

**10:00 AM -10:05 AM      Welcome remarks (Janet McCabe)**

**10:05 AM -10:15 AM      Brief Remarks from Supportive Industry Associations**

American Gas Association (AGA)

Downstream Initiative (DSI)

**10:15 AM - 10:35 AM      Introduce Program Partners**

**10:35 AM – 10:40 AM      Closing remarks**

**10:40 AM - 10:45 AM      Group Photo**

The length of the event will be 45 minutes, and structured as indicated above. Ms. McCabe will provide the opening remarks, which will last at most 5 minutes. Due to the time constraints, AGA and Downstream Initiative will both have 5 minutes each to speak.

We are planning for the company reps to provide us with a short (75 word) bio describing their company, their commitment(s), and reasons for becoming program partners, and each one of those will be read during the "Introduce Program Partners" time slot. We are planning to have company representatives come on stage for individual photos as their bios are read. We are mindful of timing for this, and hence are keeping the bios very short, but also need to balance the

fact that individuals will be traveling for this and we want to give them appropriate recognition for participating.

Finally, all individuals that plan to attend the launch event should register for the GMF. Registration is free and there is no requirement to attend any other conference events. We will have specific logistical information for participants available when they pick up their nametags at registration.

Respectfully,

Justin

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

202-343-9258

**From:** Lacey, Pam [<mailto:PLacey@aga.org>]

**Sent:** Friday, March 18, 2016 5:11 PM

**To:** Pryor, Justin <[Pryor.Justin@epa.gov](mailto:Pryor.Justin@epa.gov)>

**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>; Rubin, Jake <[JRubin@aga.org](mailto:JRubin@aga.org)>; Traweek, Lori <[LTraweek@aga.org](mailto:LTraweek@aga.org)>

**Subject:** RE: Methane Challenge Launch Event

Justin – Yes, Ralph LaRossa is definitely planning to attend and to give some remarks. We

actually had interest from a second CEO, our Board First Vice Chair and CEO of ONE Gas Pierce Norton. But if we only have 5 minutes for AGA remarks, I think I should probably find out if he still wants to come to DC. I have copied Jake Rubin our communications director – as Jake will likely draft the remarks. He can figure out which portion would be for Mr. LaRossa and which for Ms. Traweck.

- Could you give me a rough idea of how the event is likely to be structured? About how long will it be in total? An hour?

- Do you plan to have other industry *speakers*?

- How long do you plan for Air Administrator Janet McCabe to speak (and/or Administrator McCarthy if she drops in)?

- Do you plan to have company reps troop across the stage to collect their certificates like a graduation? (hope not – that would be deadly dull) I think reading the names and having them printed – along with a group photo for each group would keep it crisp while providing acknowledgement. (e.g. AGA & member distribution companies in one photo, INGAA pipelines, ONE Future if they are ready...) We could arrange for individual company photos after the main launch event.

- Just to confirm – Founding Partners etc. can come to just the launch event without having to register for the whole Global Methane conference, correct?

- Thoughts? Thanks! - Pam

**Pamela A. Lacey | Chief Regulatory Counsel**

**Office of General Counsel**

American Gas Association

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The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

**From:** Pryor, Justin [<mailto:Pryor.Justin@epa.gov>]  
**Sent:** Friday, March 18, 2016 4:27 PM  
**To:** Lacey, Pam <[PLacey@aga.org](mailto:PLacey@aga.org)>  
**Cc:** Bylin, Carey <[Bylin.Carey@epa.gov](mailto:Bylin.Carey@epa.gov)>  
**Subject:** Methane Challenge Launch Event

Hi Pam,

So March 30<sup>th</sup> is coming quick, and we are trying to tie up all of our launch event bows.

AGA is one of those bows! As previously discussed, we welcome some brief remarks from AGA during the event. Due to time constraints, we are looking to limit these remarks to a maximum of 5 minutes. As far as content goes, we would appreciate it if AGA could share the planned remarks with us prior to the event for our awareness (if possible, by March 23). Can you confirm that Ralph LaRossa and Lori Traweck are still planned to speak (or if the time constraint may make it difficult for both to speak)?

Our agenda at this point is as follows (it has been evolving, but if further changes are made that may affect AGA, we will be sure to share with you):

**Agenda:**

**10:00 AM -10:05 AM     Welcome remarks**

**10:05 AM -10:15 AM     Brief Remarks from Supportive Industry Associations**

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**Downstream Initiative (DSI)**

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**10:35 AM – 10:40 AM     Closing remarks**

**10:40 AM - 10:45 AM     Group Photo**

Please do not distribute this draft agenda, as we intend to send a final, detailed version to all companies attending. Please let me know if you have any questions, and have a great weekend!

Respectfully,

Justin

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

202-343-9258

**To:** Beck, Elizabeth A.[Ebeck@Vectren.com]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Pryor, Justin  
**Sent:** Mon 3/21/2016 2:58:10 PM  
**Subject:** RE: Founding Partner Deadlines

Hi Elizabeth,

The start date does not need to coincide with the signing date of the Partnership Agreement . You may set it for April 1, or anytime between now and 6 months from joining the Program. As for the achievement year, you would fill in 5 years from your starting year (2021; no need to specify the year you will be reporting on 2021's activities). Finally, the Implementation Manager does not need to be an executive, but someone that would serve as the contact point concerning implementation of the Methane Challenge Program.

Hope this helps! Feel free to contact me with any other questions.

Respectfully,

Justin

Justin Pryor  
Climate Change Division  
U.S. Environmental Protection Agency  
202-343-9258

-----Original Message-----

From: Beck, Elizabeth A. [mailto:Ebeck@Vectren.com]  
Sent: Monday, March 21, 2016 10:41 AM  
To: Bylin, Carey <Bylin.Carey@epa.gov>  
Cc: Pryor, Justin <Pryor.Justin@epa.gov>  
Subject: RE: Founding Partner Deadlines

I'm working on the final paper work for the BMP commitment and have a few final quick questions.

- Start date - Does this need to coincide with the signing date of the BMP agreement or can we set it at the beginning of April 1st to keep our implementation dates at the beginning of a month?

- Achievement year - If we are going out 5 years, would we fill in that blank with 2021 for achievement, but the reporting year for that would be 2022?

- Implementation Manager - does that need to be an executive or can it be someone at the Manager/Director level?

Thanks!  
Elizabeth Beck

-----Original Message-----

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]  
Sent: Wednesday, March 16, 2016 11:34 AM  
To: Beck, Elizabeth A.  
Cc: Pryor, Justin  
Subject: RE: Founding Partner Deadlines

Hi Elizabeth,



Thank you for following up on this, and great to hear that joining as a founding partner is still an option. As you mention, you will just need to confirm with us by the 23rd (should we count this as your confirmation?). We can be a bit flexible on receiving the Partnership Agreement, since we understand that these can take time, but would still like to receive that by the 28th or 29th.

Also, for your reference, we will be sending a letter out today with more details about the launch and steps leading up to the launch.

We look forward to a continued collaboration with you on this.

---

Ms. Carey Bylin  
International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S.  
Environmental Protection Agency  
Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)  
1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:  
Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

-----Original Message-----

From: Beck, Elizabeth A. [mailto:Ebeck@Vectren.com]  
Sent: Wednesday, March 16, 2016 11:31 AM  
To: Bylin, Carey <Bylin.Carey@epa.gov>  
Subject: Founding Partner Deadlines

Carey,

Thanks for taking the time to speak with our engineers. I know we went way over time, but I think our engineers have the info they need. We have to rerun all of our mileage numbers and send the replacement rates back through senior management after the clarifications. I also have to pull in another VP to review the clarifications on excavation damages to see if we can report all of the I of asked for on all damages and not just those with leaks. I think Justin was also working on some clarifications on those for us. With the 23rd approaching, what do we need to have in place to be a founding partner. My VP is still planning on being there for the 30th launch, but we are a bit behind on calculations. Can we have our intent of commitment to you in email by the 23rd or is that the hard deadline for final founding signing. The final commitment will have to clear legal and that adds time. I'm at a conference this week and unable to stand over people's shoulders to press on this also. Any guidance is much appreciated.

Thanks,  
Elizabeth Beck  
Vectren

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immediately if this is an electronic communication. Thank you.

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**To:** Lacey, Pam[PLacey@aga.org]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Pryor, Justin  
**Sent:** Fri 3/18/2016 8:27:13 PM  
**Subject:** Methane Challenge Launch Event

Hi Pam,

So March 30<sup>th</sup> is coming quick, and we are trying to tie up all of our launch event bows.

AGA is one of those bows! As previously discussed, we welcome some brief remarks from AGA during the event. Due to time constraints, we are looking to limit these remarks to a maximum of 5 minutes. As far as content goes, we would appreciate it if AGA could share the planned remarks with us prior to the event for our awareness (if possible, by March 23). Can you confirm that Ralph LaRossa and Lori Traweek are still planned to speak (or if the time constraint may make it difficult for both to speak)?

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**10:05 AM -10:15 AM      Brief Remarks from Supportive Industry Associations**

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**10:35 AM – 10:40 AM    Closing remarks**

**10:40 AM - 10:45 AM    Group Photo**

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Respectfully,

Justin

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

202-343-9258

**To:** Lacey, Pam[PLacey@aga.org]  
**Cc:** Bylin, Carey[Bylin.Carey@epa.gov]  
**From:** Pryor, Justin  
**Sent:** Fri 3/18/2016 4:26:05 PM  
**Subject:** RE: Methane Challenge question: vintage coupled pipe leaks more than unprotected steel - can it be included?

Good Afternoon Pam,

I want to apologize for the delay on this response. I hope this helps!

Thank you for your questions. At this point, without sufficient time to evaluate and compare emissions from vintage coupled pipe and unprotected steel pipe, we intend to move forward with the commitment option as it is currently detailed in our Supplementary Technical Information document. We did not receive any comments regarding this issue during our public review and comment period, but we have however incorporated into the program a “continuous improvement” element. As described in our BMP Commitment Framework document, we seek to improve our program with input from stakeholders over time. EPA will review information and data supplied by partners and make decisions on a case-by-case basis after evaluating the recommendations.

As a reminder, the mains replacement commitment has a timeframe of up to 5 years from the start date during which companies can build up to the minimum annual rate of replacement they commit to. If your company still wants to sign up at the corporate level but have individual commitments for each of the LDCs/states/subsidiaries based on their individual cast iron and unprotected steel inventories, you may do so utilizing this [Partnership Agreement](#) along with its associated Appendix. Otherwise, the individual companies may sign separate Partnership Agreements, as well.

Thank you, again, for your questions, and please feel free to follow up with me with anything else.

Respectfully,

Justin Pryor

Climate Change Division

U.S. Environmental Protection Agency

202-343-9258

**From:** Lacey, Pam [mailto:PLacey@aga.org]

**Sent:** Friday, March 11, 2016 4:14 PM

**To:** Bylin, Carey <Bylin.Carey@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>

**Subject:** Methane Challenge question: vintage coupled pipe leaks more than unprotected steel - can it be included?

Carey and Justin –

I have a question from a member company. You may recall that there have been problems with old couplings that have been drying out due to very dry gas (either from LNG or from dry gas coming from some shale plays). The dried out couplings then leak – far more than unprotected steel pipe. State utility commissions have required companies to replace many miles of pipe with these vintage couplings. With that background, here is the question (with company-identifying information removed because I can't reach them to find out if they mind me telling you who it is) --

We are on the bubble for Tier 2 and Tier 3 designation – by about one mile. This makes a huge difference for us – essentially it determines whether we can make a [corporate] system wide commitment or just commit to [one state].

However, if we are allowed to count our vintage coupled pipe as unprotected steel – as we are permitted to do by our [state A] and [state B] Commissions – we use the same GHG emissions factor as unprotected steel – then we are deep into tier 3 reporting because we have added hundreds of miles of planned pipe replacement.

Essentially our Commissions allow us to make this designation because our vintage coupled pipe has the same or higher leak count as our unprotected steel pipe. In fact, I believe our vintage coupled pipe actually has a higher leak count than unprotected steel.

Do you know if EPA has considered these situations? You may recall that about 10 years ago this vintage coupled pipe started to have higher leak counts and we began an aggressive replacement program that is still continuing. Studies attributed this situation to dryer gas, or lower hydrocarbon counts in the LNG gas that we were receiving and taking straight off the system from nearby [LNG facility]. At the time we were relatively unique. I have now heard that some other utilities are having similar problems but for different reasons. In these cases, LDCs are seeing “dryer” gas overall as richer hydrocarbons are being stripped off of fracked gas.

So ... are we alone with this issue? Any chance that EPA might count vintage coupled pipe, especially when our commissions are applying the same emissions factor to this pipe as that applied to unprotected steel?

Thank you for considering this. I know the company is eager to sign up at the corporate level for all its states.

Best regards, Pam

**Pamela A. Lacey | Chief Regulatory Counsel**

**Office of General Counsel**

American Gas Association

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